

REPORT OF THE WSCUC TEAM
For Reaffirmation of Accreditation

To: Western University of Health Sciences

March 11-13, 2026

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The team evaluated the institution under the 2023 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.

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SECTION I – OVERVIEW AND CONTEXT

A. Description of Institution and Accreditation History

Established in 1977 as the College of Osteopathic Medicine of the Pacific, Western University of Health Sciences (WesternU) is a private, nonprofit, graduate level university known for its commitment to educating health practitioners and medical professionals with a humanistic approach to patient care. WesternU was first accredited by WSCUC in 1996. Since then, its accreditation has been reaffirmed three times, most recently in 2018. That 2018 review led to a Special Visit in 2021 to address concerns about the board of trustees, diversity, and shared governance, which resulted in a Notice of Concern. A second Special Visit in 2023 centered on these same issues resulted in the removal of the Notice of Concern.

WesternU is guided by a mission rooted in a humanistic tradition, which emphasizes compassion, scientific excellence, and a deep commitment to enhancing quality of life. The embodiment of this mission can be seen in how WesternU contributes to the public good through education (e.g., the Health Career Ladder program), healthcare (e.g., health fairs, screenings, immunizations) and civic engagement, particularly its graduates' work in medically underserved communities and areas with demonstrated health professional shortages.

WesternU also encourages research, including the Student Research Fellowship Program and funded faculty scholarship, both of which support WesternU's role in advancing innovation and providing meaningful social impact.

In addition to its College of Osteopathic Medicine of the Pacific, WesternU has added several additional colleges over time, including Health Sciences, Pharmacy, Graduate Nursing, Veterinary Medicine, Dental Medicine, Optometry, and Podiatric Medicine. In the last several years, WesternU has expanded its offerings to include additional graduate level health-related degrees and certificates (e.g., Doctor of Biotechnology and Pharmaceutical Sciences (PhD-BPS),

Doctor of Nursing Practice – Leadership (DNP/Leadership), Post-Master’s Psychiatric Mental Health Nurse Practitioner Certificate, and a Post-Graduate Emergency Nurse Practitioner Certificate).

In the fall of 2025, WesternU had a total enrollment of 3,686 across eight colleges and 25 programs in both onsite and distance education modalities. WesternU employs approximately 1,600 employees and has an annual operating budget of \$260 million. Of its 502 professors, 127 (31%) are tenure-track. WesternU’s main campus is on 22 acres in Pomona, California, and it has two state-of-the-art facilities forming its Lebanon, Oregon campus.

B. Description of Team’s Review Process

The team received initial access to WesternU’s files in May of 2025 which included accreditation history and prior WSCUC interim reports from Fall 2022, Special Visit reports from 2021 and 2023, and Reaffirmation letter from 2018. The team received WesternU’s institutional report in July 2025 along with additional supporting evidence. The team chair met with the president of WesternU on August 21, 2025. Each team member completed the offsite worksheet, evaluating the institution against the 2023 standards and its response to prior WSCUC concerns. The team’s assistant chair compiled all initial responses on the team’s worksheet in preparation for a virtual meeting on August 28, 2025. During the call, the team identified initial areas of strengths and themes for possible lines of inquiry and agreed to a division of effort in preparing the report. The Offsite Review (OSR) occurred on September 17-18, 2025.

During the OSR, the team reviewed the institutional report and supporting documents and developed the following lines of inquiry to pursue during the accreditation visit:

1. **Use of the results of inquiry, evidence, and evaluation:** The team is interested in understanding how WesternU utilizes and analyzes its data for decision-making.

- What are some examples of actions you have taken based on data collected?
- How will achievement of WISH goals be documented and disseminated? How does the accomplishment of WISH 1 goals determine future WISH goals?
- How has the assessment of Learning Enhancement and Academic Development (LEAD) services impacted decision-making?
- How will WesternU prioritize and determine which student success initiatives are realistic, actionable, and sustainable? How does WesternU use longitudinal data on board pass rates or time-to-degree?
- What are some examples of how new programs or changes in policies or procedures have impacted student life?
- What were student perceptions, feedback, and measurable outcomes regarding the IPE template?
- How has the decrease in student satisfaction in 2024 been discussed on campus? How has it informed activities in 2025 and beyond?

2. **Institutional Research and Enterprise Data Management and Analytics:** The team would like to understand the relationship between Institutional Research and the Office of Enterprise Data Management and Analytics.

- How and why did this partnership originate?
- What is the division of responsibilities between these two offices?
- What policies, processes, standards, and roles do these two offices implement to manage their data assets throughout their lifecycle, ensuring data quality, security, usability, and compliance with applicable regulations?

3. **Assessment of Learning Outcomes:** The team is interested in understanding how institutional learning outcomes are systematically assessed across colleges and programs.

- What are the strategies in place to address “developing” learning outcomes.
- What revisions have been made to the Interprofessional Education course series?
How has faculty input shaped those revisions?
- What actions are taken when a program is rated “Initial” or “Emerging” in key ILO domains? What targeted strategies are in place to address these ratings?
- Are there defined timelines, benchmarks, and accountability mechanisms or plans for follow-up and for improvement following program review?
- How has the co-curricular review process been implemented? How has it improved the student experience? What modifications have been made?

4. **Faculty Capacity and Development:** The team would like to understand the strategies that are in place to ensure faculty workload is sustainable while supporting both instructional excellence and the exercise of academic freedom.

- How does WesternU track scholarship activity relative to expectations, given its high teaching/clinical loads?
- What is the effectiveness of faculty development initiatives?
- What additional evidence supports faculty quality beyond student to faculty ratios, FTE of full-time faculty, and evaluation forms?

5. **Board of Trustees Governance and Accountability:** The team is interested in how the Board understands its own effectiveness.

- What processes and policies does the Board use to assess their own work?
- What are examples of how the Board has used those assessments?
- How does the Board attend to and sustain the quality and diversity of its members?

6. **Staff Support:** The team is interested in understanding how WesternU is cultivating a vital and engaged staff culture.

- To what extent is there a data driven planning and recruitment strategy for staff?
- What is the role of CETL in providing professional development for staff?
- What structures are in place to promote professional growth and advancement for staff?

7. **Enrollment:** The team would like to understand how WesternU is managing the sustainability of enrollment across different programs in alignment with institutional goals.

- What information, data, and indicators regarding stability and quality of enrollment across programs is being used?
- How is enrollment management connected to strategic planning?

During the team conference call in February 2026, team members reviewed the additional information provided by WesternU and divided the responsibilities for the writing and inquiry that would be conducted. This enabled the members to pursue lines of inquiry and draft preliminary documents to guide the visit. The team discussed the preliminary schedule and agreed that during the visit it would remain together for some meetings, although separate meetings requiring follow-up or a more focused conversation would sometimes be necessary. In preparation for the onsite visit to the Lebanon branch campus and the main campus in Pomona, the team chair had an additional conversation with the WesternU president on February 9, 2026.

C. Institution's Reaffirmation Report and Update: Quality and Rigor of the Report and Supporting Evidence

WesternU's institutional report was organized around the areas delineated by the July 14, 2023 WSCUC Commission action letter. For each requirement, the report summarized actions taken, a preliminary assessment of the effectiveness of the actions taken, remaining items to address, and reflections in light of their review. The report provided ample foundation for the

visit, and the onsite interviews and discussion provided context and additional information to answer questions and shape the team's findings.

The team reviewed the supporting evidence provided and found that WesternU addressed the issues and concerns raised by the Commission through an institutional culture that understood the importance of the Accreditation Visit. The team found that WesternU's report was completed under the leadership of the president. WesternU clearly devoted time, expertise, and experience to assure the process was thorough and reflective. The president assumed the role as the college's CEO; the CAO assumed the role as leader of the academic program. The senior vice provost served as the ALO for this visit and was the one responsible for mapping the college's own procedures and policies to the accreditation process.

SECTION II – EVALUATION OF INSTITUTIONAL REPORT

A. Response to Previous Commission Actions

As noted in the previous section, the July 14, 2023 WSCUC Commission letter required that WesternU respond to two areas of concern: the board of trustees, and a data driven culture. The institutional report provided a summary of actions taken including related specificity in the institutional essays.

Board of Trustees

WesternU provided detailed information about the actions taken to strengthen the governance of the board. This included new bylaws for the board and its committees, increasing the size of the board, and diversifying both its membership and areas of expertise. The institutional report provided additional detail reflecting the impact of these actions taken to address concerns shared in the commission letter.

The first area is the development of a set of guidelines that indicate which university

initiatives require board approval and which are being shared with the board for informational purposes. To address this issue, the board implemented an authority matrix to clarify board and committee responsibilities and to track board actions, and is using board management software (OnBoard), which also helps to facilitate overall communication. Additionally, the creation of an executive liaison officer whose responsibility is to enhance communication between the president and the board has strengthened communication and effectiveness. They have clarified the role of each of the board's committees. Board committees have shifted from presentation-based meetings to working committees with clearly articulated authority boundaries.

The board has also worked to develop a more evidence-based practice to guide decision making. The board has key performance indicators (KPIs) that reference external benchmarks as well as institutional data. These are generated through either WesternU's assessment processes or its institutional data and are used to guide-decision-making. The board has also engaged in data-literacy training to deepen their ability to use data to guide decision-making.

Finally, the board has worked to maintain its independence and actively balances its interests and priorities consistent with the WesternU mission and the related fiduciary responsibilities of the institution. Governance practices appear increasingly structured and reflective. The board conducts regular self-assessments and formal evaluations of the president, engages in risk discussions, and maintains defined communication channels between the chair and the president. The board has revised its conflict-of-interest policy and is attentive to the diversity of its membership. They have increased their engagement with relevant stakeholders and legal counsel in ways that suggest a more reflective, strategic, and maturing board.

Data-Driven Culture

Since the 2023 report, WesternU has focused on collecting data to drive decision-making while simultaneously creating a larger infrastructure of shared governance. The creation of the

larger data governance structure, which now includes five branches: 1) the Academic Senate; 2) Deans' Council; 3) Staff Council; 4) Student Government Association; and 5) University Executive Operations Team, began with an assessment of the shared governance structure with the assistance of external consultants. WesternU also conducted a review of all human resources (HR) policies to ensure compliance with legal requirements and best practices, implemented processes that collect evidence on the efficacy of HR, and established a talent acquisition team to increase responsiveness to HR inquiries. HR implemented several new platforms to help them with compliance and risk management (e.g., HireRight and E-Verify). Finally, HR has conducted trainings across campus to help faculty and staff understand new policies and practices as well as benefits. The data infrastructure continues to evolve along with the analysis of data.

B. Institutional Essays

Standard 1: Defining Institutional Mission and Acting with Integrity

Institutional Purposes (CFRs 1.1, 1.2)

Western University of Health Sciences demonstrates a broadly held and deeply embedded commitment to its mission, particularly its emphasis on humanism, clinical excellence, and student-centered education. The mission is not merely articulated in institutional materials but is visible in practice through ceremonies such as the student-led “first patient” events, interdisciplinary clinical education, community engagement initiatives such as the Practical Application Labs (PALs) program in Lebanon, and the integration of clinical preparedness from the first year of study. Both students and faculty commented on the value of the mission as a determining factor in their decision to attend or work at WesternU. Students and alumni indicated that the mission was clearly evident in clinical and volunteer placements.

Integrity and Transparency (CFRs 1.3-1.8)

Institutional leadership described a period of rapid growth during which governance and operational infrastructure did not initially evolve at the same pace as program expansion. The current administration has intentionally focused on institutional maturation, formalizing shared governance structures and activating advisory and governing bodies that previously did not exist in their current form. The establishment of the five branches of shared governance represents a significant structural evolution and signals a deliberate move toward inclusive institutional dialogue.

The University Council serves as a culminating body in the shared governance structure designed to bring together representatives from across advisory groups to surface university-wide issues and foster transparent dialogue. Students reported that their senators actively gather feedback and communicate institutional changes, and examples were provided of student-driven improvements. Faculty and staff similarly acknowledged increased avenues for participation compared to prior administrations, though perceptions vary regarding the degree to which input consistently results in action.

The executive team described a notable evolution in its approach to shared services and institutional decision-making, particularly through the implementation of a structured three-year capital planning process. The second iteration of this process reflected a meaningful shift from prior practice by incorporating broader stakeholder input and creating a formal mechanism for collecting and organizing feedback. This progression signals growing institutional maturity and responsiveness to lessons learned between planning cycles.

A constructive development within this process was the introduction of the RACI framework (i.e., Responsible, Accountable, Consulted, Informed) to clarify goals and delineate

responsibilities. The use of RACI represents a tangible step toward strengthening accountability and operational clarity within executive-level decision-making. It provides a structured method to reduce ambiguity, define decision rights, and align ownership with outcomes—particularly important in a multi-campus institution with layered governance structures.

While the RACI model appears to have been applied effectively within the shared services and capital planning context, its use does not yet appear consistently institutionalized across councils, committees, and cross-functional bodies. The dialogue suggested some uncertainty regarding whether this framework is systematically embedded beyond executive-level initiatives. Institutionalizing such a role-clarity framework across Deans' Council, Academic Senate, Staff Council, and related committees could further strengthen shared governance by clarifying authority, accountability, and implementation pathways. This would be particularly valuable in areas such as budget oversight, climate response planning, and policy enforcement, where decision rights and follow-through mechanisms may otherwise become diffuse.

At the board level, governance practices appear increasingly structured and reflective. Board committees have shifted from presentation-based meetings to working committees with clearly articulated authority boundaries. The board conducts regular self-assessments and formal evaluations of the president, engages in risk discussions, and maintains defined communication channels between the board chair and the president. These practices demonstrate attention to governance maturity and risk oversight.

At the same time, the team observed that while structures for policy creation and shared governance are well-developed, implementation and follow-through mechanisms are not consistently institutionalized. Multiple councils and committees operate with overlapping

charges, and role clarity—while improving through tools such as the RACI model in shared services—has not yet been uniformly embedded across governance bodies. Stakeholders noted variability in whether concerns raised through governance channels are consistently tracked to resolution. Continued attention to the formalization of implementation processes, documentation standards, and communication of outcomes will enhance institutional confidence and operational consistency.

During meetings with deans, executive leadership, HR, and the compliance officer, the team was made aware that the institution is dealing with a significant institutional risk related to the verification of faculty credentials, verification, and policy enforcement and has consequentially adopted a new policy effective February 9th, 2026, authorizing post-hire scrutiny and verification of faculty credentials, with consequences up to and including termination for failure to comply.

While adoption of this policy represents an important step, the team learned that implementation appears inconsistent and accountability unclear. Subsequent discussions with HR and compliance revealed ambiguity regarding responsibility for proactive institutional review. The reliance on decentralized requests rather than a coordinated institutional response creates the perception of uneven enforcement and exposes the institution to regulatory, accreditation, reputational, and malpractice risk.

Further concern arises from the lack of clarity regarding ownership and follow-through. HR reports to Compliance; however, neither function articulated a defined timeline, documented protocol, or institutional audit process to ensure comprehensive review. This suggests gaps in accountability structures and enforcement mechanisms necessary to safeguard academic integrity and institutional compliance.

Additionally, the handling of communication with deans and faculty revealed additional governance concerns. While HR appropriately protects confidential personnel information, its position that those who initiate a concern are not entitled to status updates reflects a narrow interpretation of confidentiality. Protecting privileged details is appropriate; however, institutional integrity also requires that individuals who raise legitimate compliance concerns receive confirmation that the matter was investigated in accordance with policy. Conflating confidentiality with complete informational silence undermines trust in institutional processes and may discourage future reporting of risks.

Collectively, these observations indicate that while the institution has adopted an appropriate policy framework, it has not yet demonstrated a coordinated, timely, and institution-wide implementation strategy. The absence of centralized ownership, documented audit procedures, and transparent (yet appropriately confidential) feedback mechanisms represents a material compliance and governance vulnerability. While corrective action was taken while the team was onsite, the team urges WesternU to continue to actively monitor this situation.

The climate survey process and compensation study represent additional opportunities to reinforce trust by translating feedback into visible, measurable action plans. Staff expressed both appreciation for institutional culture and benefits and concern about delayed follow-through on equity issues. The institution's continued maturation will benefit from aligning communication, implementation, and accountability structures to match the strength of its mission-driven intent.

Policies regarding student conduct, human subject research, disability, financial matters, degree requirements, academic credits, and grading are clearly outlined in the publicly available WesternU catalog. The Admissions and Financial Aid office maintain a website articulating the cost of attendance and information and resources to assist students in applying for aid. Materials

regarding academic freedom for faculty, staff and students are easily accessible. The general information page in the WesternU catalog describes the value it places on its mission: “For over 45 years, Western University of Health Sciences has had a special mission: Educating tomorrow’s health care professionals with a combination of scientific excellence and a humanistic, compassionate approach to patient care.”

Overall, WesternU demonstrates a strong mission-driven ethos, evolving maturity of governance, and increasing fiscal stability. Continued attention to execution, accountability, and transparent follow-through will further strengthen institutional integrity and shared governance effectiveness.

Standard 2: Achieving Educational Objectives and Student Success

Degree Programs (CFRs 2.1-2.4)

WesternU demonstrates a strong commitment to academic rigor and clinical excellence across its 25 graduate-level degree and certificate programs. Each program is governed by discipline-specific learning outcomes that are aligned with professional and institutional standards. The institution’s simulation facilities and clinical skills laboratories at both campuses are state-of-the-art and integrated into curricula beginning in the first year. Faculty and students consistently articulated a shared focus on professional development, clinical preparedness, and meaningful patient-centered learning experiences.

Professional accreditation processes define the core requirements for many programs and graduate competency is validated through board exams and licensure metrics. Beyond these metrics, WesternU’s cycle of program reviews combined with the work of the University Assessment Committee come together to ensure that WesternU programs clearly define expectations for student achievement.

The curriculum is developed and evaluated by faculty-led committees in each college. Curricular mapping, outcome tagging, and periodic review assure alignment with learning outcomes. WesternU places a high priority on high-impact practices (e.g., simulations, team-based learning) which is meant to prepare students for entry into clinical environments.

The institution demonstrates a strong commitment to assessment, including the annual evaluation of all institutional learning outcomes (ILOs) and dissemination of findings to deans and departments. Data is distributed through established channels, and departments are expected to develop action plans in response to identified gaps. However, the current process is complex, cumbersome, and diffuse in accountability. All Institutional Learning Outcomes (ILOs) are assessed annually, and results are disseminated to deans and departments. The deans are responsible for developing action plans and “closing the loop.” Reports are submitted through a structured survey process. In several cases, responses were described as abbreviated or lacking clarity regarding the specific intervention, rationale, or measurable impact.

The “closing the loop” reports, while required, are submitted through a format that allows for responses of varying depth and quality. Several responses were described as abbreviated or insufficiently detailed, limiting their usefulness in demonstrating the rationale, implementation strategy, or measurable impact of corrective actions. Although recent efforts to share prior-year findings represent progress, there is no clearly designated individual or centralized mechanism responsible for verifying that action plans are completed, evaluated for effectiveness, and integrated into broader institutional priorities.

While deans are charged with implementing changes, the University Assessment Committee functions primarily as a consultative body, and it reads more than 100 reports annually trying to manage the assessment work across the colleges. As a result, the responsibility

for ensuring the completion, documentation, and evaluation of action plans is decentralized and inconsistently applied. The team urges WesternU to consider a more manageable assessment structure, one that moves the University Assessment Committee away from surface-level compliance (e.g., the report is complete, the ILO is only partially being met) and towards understanding and documenting the ways in which colleges are contributing to the overall learning goals of the institution. For example, reporting on one ILO a year (even if measurement of all ILO's continued) would permit the Assessment Committee time to work with colleges, deans, and departments to really understand what was happening on the ground, and help them both understand their assessments and articulate the extent to which the ILO is being met.

The WSCUC self-study process itself surfaced meaningful insights, including gaps in ILO and PLO mapping and instructor awareness of mapped outcomes. Faculty acknowledged that while PLOs were technically mapped to ILOs, some instructors were not fully aware of or intentionally teaching to those mapped outcomes. This underscores the gap between structural alignment and pedagogical implementation.

Faculty (CFR 2.5-2.8)

All WesternU faculty are professional and academically qualified, holding credentials that align with their teaching and/or clinical responsibilities. As mentioned in Standard I (see page 14) a compliance-related concern regarding faculty academic credential verification emerged during our visit. The issue was resolved during our visit and the team is comfortable that a process for institution-wide academic credential verification is currently in place.

Faculty participate in shared governance structures, including the Academic Senate and its standing committees, and they ensure that faculty have a central role in curriculum development, assessment, and policy. College-level curriculum committees develop and manage program-specific

content and take the lead on assessment. Institution-wide bodies like the University Curriculum Committee and University Assessment Committee work to foster alignment across programs.

Expectations for research, scholarship, and creative activity are made clear in the faculty handbook, which provides the rules, policies, and practices for faculty organization and governance, as well and there are internal (e.g., seed funding, Institutional Review Board) and external sources of support faculty in the development of scholarly projects. Of particular note is the Center for Excellence in Teaching and Learning (CETL) which provides faculty development opportunities, including academic boot camps and pedagogical workshops.

Faculty are evaluated annually through a structure performance evaluation process which informs tenure, promotion, and merit pay.

Faculty workload is managed through structured spreadsheet-based models accounting for lecture, lab, and independent responsibilities, and faculty development funding (\$2,500–\$3,500 annually) supports professional growth. Faculty expressed appreciation for research community engagement and collaborative culture, though some noted variability in grievance processes and communication follow-through.

Student Learning and Performance (CFRs 2.9-2.11)

WesternU's academic programs all have clearly defined ILOs and PLOs that are included in course syllabi and in the University Catalog. The team heard about a number of methods used to evaluate student learning, including “mock” board exams and the Simulated Medicine and Readiness Training (SMaRT) lab that simulates real-world health scenarios from ambulance bays to emergency rooms to doctor's offices. Students at WesternU also participate in rotations and externships with affiliated hospitals, clinics and in community health settings. Each of these

reinforce the classroom instruction and prepare students for realistic environments in which they will practice.

WesternU monitors its attrition and graduation rates by program type (Doctoral, MS . Research, MS Professional, Post-Masters Certificates), gender, and race. Data suggest that all major demographic groups are graduating at reasonably similar rates. These metrics are reviewed by each college and connected to resource allocation. For example, when the College of Podiatric Medicine wanted to address a higher attrition rate than they deemed acceptable, they added additional early clinical shadowing to enhance retention from year one to year two.

WesternU also tracks student placement into residencies, fellowships, and employment across the health professions, and is justifiably proud of their strong record of success. They also track the number of graduates serving in medically underserved areas, and areas which have a shortage of medical health professionals. Again, this is an area where WesternU is rightly proud of its accomplishments, with over 30% of its graduates practicing in these areas.

Alumni surveys administered one and three years out indicate high levels of satisfaction with the preparation for their careers, with their understanding of how to provide social benefit, and with skill development. WesternU also uses the results of these alumni surveys to inform curricular changes, for example the expansion of Interprofessional Practice of Education IPE modules.

Student Support (CFRs 2.12-2.14)

Student support services including, Learning Enhancement and Academic Development program (LEAD), Center for Disability and Health Policy (CDHP), and Library, University Student Affairs (USA), are intentionally integrated within a cohesive, unified framework

designed to streamline student navigation and significantly enhance access. Institutional utilization data demonstrates strong student engagement, with approximately 21% of the student population participating in LEAD services and an impressive 95% of surveyed students reporting academic benefit. Students consistently expressed high levels of satisfaction with the breadth, quality, and responsiveness of available support services. Institutional leadership further reports notable increase in service utilization following recent structural realignments, underscoring the effectiveness of these reforms.

Collectively, these outcomes reflect a robust and well-coordinated student supports system that is closely aligned with and highly supportive of the institution's educational mission and student success goals.

Standard 3: Assuring Resources and Organizational Structures

Faculty, Staff and Administrators (CFRs 3.1-3.3)

WesternU staffing levels are primarily determined by the college deans as well as the division/department heads based on their assessment of their own operational needs and budgets. HR monitors staff workload and staffing levels by meeting with the deans and their respective directors of operations on regular basis to review their recruitment/staffing/workload demands and provide updates and guidance on their recruitment and/or employee relations involving management of performance and workload. Overall, staff count increased by 10% in 2024 compared to 2020.

The overall student-to-faculty ratio has improved from 8.6 to 7.3 with faculty increasing from 446 to 502. However, there is considerable variation in student to faculty ratios (ranging between schools, ranging from 5.4 to 16.5). Overall, WesternU employs a sufficient number of faculty and staff with the qualifications and experience necessary to support and advance

WesternU's mission and vision.

WesternU has established clear and inclusive hiring policies and processes, with written policy for interim or acting appointments of university-level administrators. For example, CPM targeted recruitment shows stable completed applications numbers despite marked decrease in total applicants.

WesternU has a workload policy and guidelines that are clearly articulated in the faculty handbook. The workload expectations vary appropriately between faculty and staff. Some faculty expressed concern regarding their workload expectations as it relates to time allotted to administrative and committee work, articulating that the actual time for the work far exceeds the ratio allotted. The team also heard some staff members express a concern about being asked to work "off the clock." The team noted that many community members expressed that the dedication to shared governance has had the unintentional consequence of increasing faculty and staff workload. The team urges WesternU to remain attentive to matters of staff workload as they continue to develop shared governance, with special attention to staff who are asked to implement decisions and new initiatives.

The institution has also made significant investments in compensation equity and financial sustainability. A comprehensive compensation analysis led to a significant financial investment to address market gaps for faculty and staff, and tuition dependency has been reduced from 96% to 74% through philanthropic growth and endowment strategy. These actions reflect proactive stewardship and long-term financial planning aligned with mission priorities.

WesternU offers a wide array of academic professional development opportunities to facilitate educational technology innovations, instructional design, and learning development and interprofessional practice and education. The center for excellence in teaching and learning

(CETL), which includes the academic boot camp, is a great example of such resource and is well attended. The CETL program is well funded and well attended, however, metrics and outcomes demonstrating its efficacy are still emerging. CETL programs are created based on individual requests, however, although the team noted that course evaluations, if reviewed in totality and used as an input for new courses, emerged as a potentially beneficial modification. In addition, the Interprofessional Practice of Education (IPE) program, which began in 2009, has reached a level of maturity and currently operates through the development of training programs across WesternU schools only. The team noted that WesternU is assessing the plausibility for expanding engagement to include external universities and programs.

Fiscal, Physical, Technology, and Information Resources (CFRs 3.4-3.6)

WesternU delineated a comprehensive and inclusive budgeting process. The institution utilizes clearly defined timelines and responsibility schedules that engage stakeholders across the university, ensuring broad participation in financial planning. The budget is aligned with the institutional strategic plan, which is informed by individual college business plans. This approach supports alignment between resource allocation and operational priorities at the college level.

Currently, the budget development cycle spans approximately 11 months (August through June), which limits the institution's agility and responsiveness to evolving priorities and emerging opportunities. Across various settings, the team noted that staff expressed concerns with shifting priorities affecting resourcing. While the current model effectively supports ongoing operations, it appears less flexible in allocating resources toward new initiatives or strategic investments. The level of financial resources available to support strategic plan execution is not entirely clear, although the team noted the presence and value of the strategic

budget plan was clearly articulated.

Additionally, although financial and human resource systems are well described, the documentation provides limited analysis of how resource allocation decisions directly impact academic quality, program effectiveness, or student outcomes. The team noted the lack of evidence of integrated planning and resource alignment.

WesternU has also made progress in centralizing enrollment management through the recent establishment of a vice president for enrollment and the development of a centralized dashboard. The enrollment tracking tools reviewed are consistent with best practices. Enrollment trends have remained relatively flat between 2020 and 2024, with completed applications declining slightly from 9,953 to 9,717. During this period, the admit rate increased modestly from 11% to 11.8%.

The institution has taken meaningful steps toward revenue diversification. Notably, WesternU allocates approximately 40–50% of investment returns to support operations, which has reduced reliance on tuition revenue from levels in the 90% range to the mid-70% range of total revenue. This reflects a deliberate effort to broaden revenue sources, although continued diversification will be important for long-term sustainability.

WesternU demonstrates overall financial stability, supported by strong scale, liquidity, and positive operating performance. The institution reports total assets of approximately \$574 million and net assets of approximately \$314 million, underpinned by a substantial investment portfolio exceeding \$300 million. In FY2024, operations generated a positive change in net assets and positive operating cash flow, indicating that core activities remain cash generative. Liquidity is robust, with significant financial assets available within one year, and endowment spending practices appear prudent and well governed. The institution is also in compliance with

its debt covenants and has shown growth in contributions receivable, indicating positive philanthropic momentum.

At the same time, certain financial indicators warrant ongoing monitoring. The unrestricted operating margin remains relatively modest, which may limit financial flexibility in the event of enrollment fluctuations or expense increases. Long-term obligations—including bonds, operating leases, and interest rate swap exposure—introduce fixed cost commitments that require continued oversight. Additionally, recent increases in receivables (both tuition and contributions) suggest the need to monitor cash conversion cycles and working capital management closely.

WesternU's financial model shows appropriate sensitivity to external factors. In 2025, the net change in assets from operations represented approximately one-third of the investment returns allocated to operations, indicating a degree of reliance on market performance. Furthermore, enrollment has fluctuated by approximately 7% over the past five years, which, when combined with market dependency, may introduce variability in operating results.

WesternU has undertaken several initiatives to strengthen its physical, technology, and information infrastructure in alignment with institutional priorities. In 2025, the institution developed its first comprehensive capital improvement plan, along with a deferred maintenance plan and a preventive maintenance strategy. Concurrently, WesternU has initiated projects such as a campus-wide space inventory and a space planning and utilization analysis, both of which are intended to better align physical resources with the academic mission. The institution has also expanded its physical footprint through the acquisition of two additional buildings in Pomona and Lebanon.

While these efforts demonstrate a growing focus on long-term infrastructure planning, the

capital plan indicates that a significant portion of deferred maintenance remains delayed and insufficiently funded. Notably, approximately 80% of deferred maintenance projects are scheduled for 2028; of these, only 16% are fully funded, 24% are partially funded, and 60% remain unfunded. This distribution raises questions regarding the sustainability and prioritization of capital investments, particularly in balancing new asset acquisitions with the institution's capacity to address existing maintenance obligations.

In addition, opportunities exist to further enhance facilities that directly support student learning and success. These include extending parking garage access during weekends and examination periods to accommodate student study needs, exploring strategies to improve the affordability of nearby third-party student housing, upgrading classroom infrastructure, and expanding on-campus food options.

Organizational Structures and Decision-Making Processes (CFRs 3.7-3.11)

The board of trustees demonstrates a commitment to maintaining its independence and exercising its fiduciary responsibilities in alignment with WesternU's mission. Governance practices have become more structured and reflective, as evidenced by regular board self-assessments, formal evaluations of the president, ongoing engagement in institutional risk discussions, and clearly defined communication channels between the board chair and the president. The board has also strengthened its conflict-of-interest policy and increased engagement with key stakeholders and legal counsel, indicating a maturing approach to governance and oversight.

The composition of the board reflects a range of professional backgrounds; however, philanthropic expertise appears limited, with only one member bringing direct experience in this area. Given the institution's stated reliance on philanthropy as a component of its future strategy,

there is an opportunity to further align board composition and engagement with advancement goals. Expanding philanthropic capacity at the board level could enhance the institution's ability to support long-term financial sustainability and strategic initiatives.

WesternU's senior leadership is largely new, with nineteen of twenty-four members appointed under the current president, bringing fresh perspectives that may support transformational change. At the same time, this concentration of appointments may create a perception of centralized influence if roles, decision rights, and accountability structures are not clearly defined and operationalized.

As the institution advances a maturing governance model, the effectiveness of senior leaders' engagement across its five governance components will be critical to ensuring balanced decision-making and shared accountability.

To support data-informed decision-making, WesternU has established enterprise data management and analytics (EDMA) within its Institutional Shared Services (ISS) division. While this unit has made progress in developing a data warehouse, advancing analytics capabilities, and promoting data integrity, its role in informing the strategic planning process and curricular assessment holds considerable promise. The institution's data infrastructure is currently complex, with systems continuing to operate in silos and key information not consistently shared across governance bodies. For example, the Academic Senate reported limited visibility into basic institutional data, including the total number of faculty. The team urges WesternU to continue to prioritize the development of its analytics framework, emphasizing transparency, clarity, and data literacy for end users.

Standard 4: Creating and Institution Committed to Quality Assurance and Improvement

Quality Assurance Processes (CFRs 4.1-4.4)

The University Assessment Committee (UAC) systematically reviews Institutional Learning Outcomes (ILOs). In 2025-2026, UAC charged a taskforce to “synthesize the voices and evidence from all stakeholders into a clear, measurable, and mission-aligned set of ILOs that elevate excellence and the practice of humanism across the curriculum at WesternU.” These processes have amassed a huge quantity of data; most of the findings have been positive and reinforcing. When opportunities for improvement are discovered UAC attempts to provide feedback to the affected program, but the reviewers observed that UAC’s attempt to be comprehensive (e.g., every ILO every year) is paralyzing the process. The reviewers also heard concern that not all programs are receptive to constructive feedback; this political maneuvering further stifles the process of closing the loop. The institution collects and analyzes disaggregated student outcomes across the degree programs, which are published on the WesternU website.

The Center for Excellence in Teaching and Learning (CETL) is conceptualized as a resource to help transform practicing clinicians into new teachers for WesternU but also facilitates professional development of staff and existing faculty. Topical examples include (from among many others) “How’s it going so far? The art of midterm pulse checks,” “I taught it...but did they get it?,” and “Unwrapping success: using Exam Wrappers to foster student reflection.” CETL periodically surveys participants and adjusts programs and pedagogy accordingly. CETL is an exemplary signature offering of the university, at the intersection of professional development and quality improvement.

The institution has processes to solicit feedback from students and staff. During interviews, the reviewers heard examples of ways that the institution has responded to specific

recommendations voiced by students (e.g., aligning security measures with late night study practices) and staff (e.g., alternative work schedules). Of course, not all recommendations have been enacted, but the parties voiced appreciation that the institution is listening.

The team was markedly impressed to learn of the “rapid response” capability by the Student Success Team. As an example of their work, the team learned that should a cohort of students in one program receive a low aggregate score in a particular section of a board exam, the Student Success Team will intervene with program instructors to facilitate rapid learning before the next cohort takes the exam.

Each of the WesternU professional degree and certificate programs is accredited by a discipline-specific agency, including American Osteopathic Association Commission on Osteopathic College Accreditation, Council on Podiatric Medical Education, The American Veterinary Medical Association Council on Education, Accreditation Council for Pharmacy Education, Accreditation Council on Optometric Education, Commission on Accreditation in Physical Therapy Education, Accreditation Review Commission on Education for the Physician Assistant, Commission on Dental Accreditation. Also, the master’s degree program in Nursing, Doctor of Nursing Practice program, and the post-graduate APRN certificate program are accredited by the Commission on Collegiate Nursing Education. The Emergency Nurse Practitioner Post-Graduate Certificate is validated by the American Academy of Emergency Nurse Practitioners.

These rigorous, extensive, discipline-specific accreditation processes are additional evidence of WesternU’s commitment to quality assurance and improvement. As WesternU looks to expand its patient-facing healthcare services, it may wish to consider clinical accreditation, such as by the Accreditation Association for Ambulatory Health Care or by the Joint Commission’s Ambulatory Health Care Accreditation Program.

Institutional Improvement (CFRs 4.5-4.8)

Administrators, faculty and staff at WesternU work together to promote a culture of assessment and continuous improvement in both educational and administrative operations to advance the institution's mission. They understand the importance of having accurate, timely data and to collect and use data to improve policies, practices of teaching and learning, and the overall student experience.

Currently, the institution is navigating multiple software platforms and technologies that do not consistently align, creating fragmentation in data collection, reporting, and documentation. This lack of cohesion not only makes the work of OIRE and the University Assessment Committee more cumbersome, but it also hinders institutional capacity to synthesize findings across units and ensure consistent application of assessment practices. These factors suggest the need for simplification of the assessment cycle, extend PLO & ILO cycles over a more reasonable timeframe, clearer accountability structures, and a more standardized, evidence-based approach to documenting and evaluating institutional improvement.

WesternU's data infrastructure is actively and intentionally evolving. OIRE provides accurate and responsive reporting as well as supporting the program review processes, while EDMA has been newly charged with centralizing data management, warehousing, and developing a data informed culture. EDMA leadership articulated a phased plan, first building data structure and management, then advancing analytics, and strengthening institutional data literacy. While collaboration between OIRE, EDMA, IT, and other units appears collegial and well-coordinated, proactive data synthesis and institution wide integration remain in development. The institution does not currently track the extent to which distributed reports are

used or translated into measurable improvement. OIRE is well positioned to help WesternU take this next important step. OIRE's focus to date has been on managing external reporting (e.g., IPEDS), providing data in response to internal and external data requests, and sharing information, often via Sharepoint. OIRE has the staffing and capability to be more involved on campus in not only providing requested data, but in helping deans, departments, colleges, and committees make meaning of the data they are requesting from OIRE, and to document how those data inform departmental, college, and institutional decision-making.

The program review process, particularly for programs with programmatic accreditation, is organized, with action letters submitted to OIRE and reviewed by senate subcommittees. However, follow-up mechanisms to verify implementation and measure impact beyond initial submission appear limited. This is another area where partnership with OIRE could facilitate departments and deans' ability to institutionalize follow up and document institutional improvement efforts. In an ideal configuration, OIRE involvement would not be seen as oversight or accountability, rather OIRE would be seen as active partners to deans and departments to strengthen the impact of the program review process and tie it more explicitly to institutional improvements and effectiveness.

WesternU demonstrates strong academic rigor, exceptional clinical infrastructure, effective student support, and evolving data systems. The primary opportunity lies not in the absence of structures, but in simplifying assessment cadence, strengthening implementation accountability, and ensuring that data informed processes consistently translate into documented, measurable improvement across colleges and campuses.

C. Reflections: Synthesis of Insights as a Result of the Reaffirmation Process

WesternU occupies an important position in graduate medical education, with a commitment

to a humanistic approach to patient care, their graduate's work in healthcare fields has the potential to change the world for the better. The seriousness with which WesternU undertook the reaffirmation process was evident throughout the institutional report, and the organization of the visit, allowed the team many opportunities to interact with a range of people who comprise the WesternU community. Structures have been put in place, and careful and consistent attention to how to strengthen and institutionalize them will ensure that the momentum created by this reaffirmation process will continue. Here the team has in mind the shared governance and HR structures, the strengthening of a data-driven culture, and the work of the student support staff, whose work plays a leadership role in the success of its students.

Throughout the visit, the team heard about the profound commitment that faculty and staff have to the talented students who enroll at WesternU. The team also learned about a changing student body – an increasingly diverse one -- that presents challenges and opportunities in the areas of teaching, learning and mental health. WesternU has already taken important steps to address these issues. The attention to the educational, social, and mental health needs of the community, which is exemplified by the expansion of student services, and the resources needed to ensure that the achievement of a WesternU degree achievable for all who are admitted, without undue sacrifice to their health and well-being.

The work ahead for WesternU is essential. Under the leadership of the president, WesternU has made tremendous strides in shared governance, establishing a transparency in communication that is of paramount importance to WesternU's continued success. The next step in this work is mature and refine shared governance by developing and maintaining clear, documented, unduplicated structures so that roles, responsibilities, and timelines are clear and are relied upon. There is also an opportunity to ensure that decision-making processes and policies are operationalized. Formalizing and institutionalizing all policies and structural

initiatives means defining who owns what, documenting and ensuring standard operating procedures are followed, and periodically reviewing the policies to make sure they are working as intended.

Under the leadership of this president, WesternU has also completed a faculty compensation project that revised pathways to promotion for faculty and addressed salary compression for faculty. The team admires this critical work and urges WesternU to apply the same methodology to examine and address staff salaries so that they can continue to attract and retain talented staff who support their faculty and students.

The team applauds the care with which WesternU has worked to move towards a more evidence-based culture. The use of dashboards and institutional evidence by the Board of trustees, alongside data literacy training, allows them to assess performance more accurately. OIRE prepares reporting that is shared with colleges and departments, and the University Assessment Committee is committed to documenting a complex system of assessment. As it enters the next stage of the development of its data-driven culture, the team urges WesternU to leverage the work of the EDMA to create systems and processes of data storage and governance that permit those who need information to access it easily and the potential of OIRE to facilitate conversations across campus about how to interpret and use the data being shared with departments and units, so that conversations about data move away from being about having data and towards using the data to improve.

A. Compliance with WSCUC Standards Worksheet

Standard 1

WesternU has a clearly defined mission that guides its educational mission. Students and alumni spoke of the humanistic mission as the reason they chose to attend WesternU, faculty actively reinforce the humanistic values of the institution and create a culture that embodies its

commitment to service, health equity, and responsiveness to societal health needs. The mission guides staff and administrators in their decision-making, academic program development, and strategic planning.

The team's finding, which is subject to Commission review, is that WesternU has demonstrated sufficient evidence of compliance with Standard 1. Final determination of compliance with the Standards rests with the Commission.

Standard 2

WesternU is deeply committed to ensuring student success. The team witnessed a highly-integrated web of student-success services, an emphasis on professional collaboration, and a rigorous academic program that comes together to ensure that students not only possess the knowledge to be competent health care professionals and are also prepared to enter their communities equipped to serve.

The team's finding, which is subject to Commission review, is that WesternU has demonstrated sufficient evidence of compliance with Standard 2. Final determination of compliance with the Standards rests with the Commission.

Standard 3

WesternU has aligned its resources towards its educational and student success objectives and invested strategically in human, physical, fiscal, technological and information resources. The organizational and decision-making structures put in place support the mission and goals of WesternU.

The team's finding, which is subject to Commission review, is that WesternU has demonstrated sufficient evidence of compliance with Standard 3. Final determination of compliance with the Standards rests with the Commission.

Standard 4

WesternU is committed to sustained and careful assessment work in service of creating a data-driven, evidence-based decision-making process to support the ongoing pursuit of the college's mission. These activities inform planning at the institutional and college levels to systematically ensure educational effectiveness at the institution.

The team's finding, which is subject to Commission review, is that WesternU has demonstrated sufficient evidence of compliance with Standard 4. Final determination of compliance with the Standards rests with the Commission.

SECTION IV – FINDINGS, COMMENDATIONS, AND RECOMMENDATIONS

Commendations:

The team commends Western University of Health Sciences for:

- 1) Broadly held and exceptional commitment to humanism and mission-driven ethos, as evidenced by the student-led “first patient” ceremonies, which serve as respectful and dignified avenues for students and patient families to demonstrate the value and importance of human life.
- 2) A deeply student-centered culture, evidenced by its commitment to professionalism development, faculty commitment, and academic rigor alongside intentional responsiveness to student feedback. Student support services like the LEAD program, Center for Disability and Health Policy, and the library function alongside interdisciplinary team-based learning, and research opportunities to provide an integrated and supportive environment for students. Institutional leaders and faculty consistently articulated a focus on student success, clinical preparedness, and meaningful learning experiences.
- 3) Extraordinary hands-on clinical simulation capabilities and clinical skills labs at both

campuses. The spaces and equipment are state-of-the-art. The connections to curricula and pedagogy that have been developed to engage students starting in year one are laudable.

- 4) Significant community engagement. A specific example is the PALS program at the Lebanon, Oregon campus, which allows for student practical learning while inviting the community to receive services, is consistent with the institution's reputation for resilience and educational excellence.
- 5) Reducing the dependency on tuition revenue by growing philanthropic revenue and adopting an investment strategy that allocates a portion of the investment returns towards operations.
- 6) Robust budgeting processes. The process manifests how the stakeholders of the university come together for a common data-driven goal.

Recommendations:

The team recommends that Western University of Health Sciences:

- 1) Continue to mature and refine shared governance through: the development and maintenance of clear, documented, and unduplicated structures so that roles, responsibilities, and timelines are clear (e.g., RACI)); inclusion of all institutional constituencies (e.g., faculty, staff, administrators, students, alumni, trustees) in decision-making; Development of mechanisms to ensure, document, and communicate decisions made through shared governance processes; connection of shared governance to tangible outcomes, such as improved patient care or academic quality; and alignment of shared governance structures with strategic planning, ensuring they have a clear charge and meet regularly. (CFRs 3.7, 3.10, 3.11)
- 2) Ensure that the institution's decision-making processes and policies are operationalized.

Formalized and institutionalized implementation of all policies and structural initiatives with defined ownership, documented standard operating procedures, and periodic review mechanisms will ensure consistent execution and sustained compliance across the institution. (CFRs 1.4, 3.11)

- 3) Strengthen the scope of institutional research and effectiveness and its coordination with other areas of the institution such that the analysis of data is consistent with the institution's commitment to data-informed decision-making. (CFRs 4.4, 4.5)
- 4) Ensure institutional assessment leaders have the necessary capacity to lead the campus community from compliance with assessment structures and process to meaning-making using the assessment process; implement a more realistic assessment cadence, for example looking at one ILO a year, allowing for more attention to the realization of action plans; standardize "closing the loop" reporting to focus on changes made as a result of assessment findings; and align assessment technologies to ensure coherent, institution-wide data integration and accountability. (CFRs 2.3, 4.1, 4.5)
- 5) Continue advancing compensation plans that address market equity issues for staff to enhance retention and job satisfaction. (CFR 3.2)
- 6) Complement growth and asset acquisitions with investments in existing infrastructure, namely deferred maintenance. (CFR 3.6)

APPENDICES

A. Federal Compliance Forms

1. Credit Hours and Program Length Review
2. Marketing and Recruitment Review
3. Student Complaints Review
4. Transfer Credit Review

B. Distance Education Review

C. Off-Campus Locations Review

APPENDIX A: FEDERAL COMPLIANCE FORMS

Credit Hour and Program Length Review

Material Reviewed	Questions/Comments (Please enter findings and recommendations in the Comments sections as appropriate.)
Policy on credit hour	Is this policy easily accessible? ☒ YES ☐ NO
	If so, where is the policy located? University and <u>College Catalogs</u> ;
	Comments: Policy is clearly stated and accessible.
Process(es)/ periodic review of credit hour	Does the institution have a procedure for periodic review of credit hour assignments to ensure that they are accurate and reliable (for example, through program review, new course approval process, periodic audits)? ☒ YES ☐ NO
	If so, does the institution adhere to this procedure? ☒ YES ☐ NO
	Comments: Colleges review their catalogs on a yearly basis and are expected to review and address any concerns through proper channels (e.g., faculty vote, etc.). New courses are assigned credit by Curriculum Committees in the colleges, on behalf of the faculty of that college.
Schedule of on-ground courses showing when they meet	Does this schedule show that on-ground courses meet for the prescribed number of hours? ☒ YES ☐ NO
	Comments: Class schedules are readily available to students and faculty in each college.
Sample syllabi or equivalent for online and hybrid courses <i>Please review at least 1 - 2 from each degree level.</i>	How many syllabi were reviewed? 2
	What kind of courses (online or hybrid or both)? Online and Hybrid
	What degree level(s)? ☐ AA/AS ☐ BA/BS ☒ MA ☒ Doctoral
	What discipline(s)? PharmD (PHRM 5114); Graduate Nursing (GN5999)
	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: In laboratory, practicum, and other modes of delivery that require greater contact time in a supervised classroom setting, the time students spend outside of class is reduced to reflect the increased in-class time, e.g., three to four hours of in-lab time per week per credit.
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) <i>Please review at least 1 - 2 from each degree level.</i>	How many syllabi were reviewed? 2
	What kinds of courses? Independent study; Clinical rotation and experience;
	What degree level(s)? ☐ AA/AS ☐ BA/BS ☒ MA ☒ Doctoral
	What discipline(s)? Veterinary Medicine (CVM 8090); Physician Assistant Education (PA7010)
	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:
	How many programs were reviewed? 5 program/college catalogs

Sample program information (catalog, website, or other program materials)	What kinds of programs were reviewed? Doctor of Podiatric Medicine; College of Optometry; College of Osteopathic Medicine of the Pacific; Master of Science in Biotechnology and Pharmaceutical Sciences; Master of Science in Medical Sciences
	What degree level(s)? ☐ AA/AS ☐ BA/BS ☒ MA ☒ Doctoral
	What discipline(s)? Podiatric Medicine; Optometry; Osteopathic Medicine; Biotechnology and Pharmaceutical Sciences; Medical Sciences
	Does this material show that the programs offered at the institution are of a generally acceptable length? ☒ YES ☐ NO
	Comments: Each catalog includes key elements such as program outcomes, graduation requirements, and curriculum organization, all of which are linked to the program length.

Review Completed By: Laura Palucki Blake

Date: 2/15/26

Marketing and Recruitment Review Form

Under federal regulation*, 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.
**Federal regulations	Does the institution follow federal regulations on recruiting students? ☒ 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. Required disclosures are published on the institution's website: https://www.westernu.edu/registrar/policies/
Degree completion and cost	Does the institution provide information about the typical length of time to degree? ☒ YES ☐ NO Does the institution provide information about the overall cost of the degree? ☒ YES ☐ NO Comments: Information regarding the typical length of time to degree is in the <u>program catalogs</u>, and overall cost of the degree is located on the <u>Student Budgets</u> website.
Careers and employment	Does the institution provide information about the kinds of jobs for which its graduates are qualified, as applicable? ☒ YES ☐ NO Does the institution provide information about the employment of its graduates, as applicable? ☒ YES ☐ NO
	Comments: Placement data for all colleges is provided on our <u>Academic Outcomes</u> website. Colleges provide career path information on their websites as appropriate (e.g., College of Pharmacy (<u>PharmD</u>), <u>College of Podiatric Medicine</u>). Three programs, Emergency Nurse Practitioner (ENP), Family Nurse Practitioner (FNP) and Psychiatric Mental Health Nurse Practitioner (PMHNP), under College of Graduating Nursing publishes an annual Gainful Employment Disclosure.

*§602.16(a)(1)(vii)

**Section 487 (a)(20) of the Higher Education Act (HEA) prohibits Title IV eligible institutions from providing incentive compensation to employees or third party entities for their success in securing student enrollments. Incentive compensation includes commissions, bonus payments, merit salary adjustments, and promotion decisions based solely on success in enrolling students. These regulations do not apply to the recruitment of international students residing in foreign countries who are not eligible to receive Federal financial aid.

Review Completed By: Laura Palucki Blake
 Date: 2/15/26

Student Complaints Review Form

Under federal regulation*, 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? ☒ YES ☐ NO
	If so, is the policy or procedure easily accessible? Is so, where? <u>University Catalog</u> <u>Office of Title IX and Equal Opportunity</u>
	Comments: Information is accessible and available. Students expressed they were aware of policies and procedures on how to file a complaint.
Process(es)/ procedure	Does the institution have a procedure for addressing student complaints? ☒ YES ☐ NO
	If so, please describe briefly: The college and the university catalogs describe in detail the processes by which students can submit complaints and concerns at the institutional and college levels.
	If so, does the institution adhere to this procedure? ☒ YES ☐ NO
	Comments: Title IX complaints that proceed through the alternative resolution process include a solution or solutions that both parties agree to in writing. For complaints that proceed through the grievance process and result in a finding of responsibility, sanction recommendations are then forwarded to an adjudicator who then makes the final sanctioning determination. Either party may appeal the hearing decision or sanctions. The Title IX Coordinator is responsible for ensuring completion of sanctions involved with either procedure's outcome(s).
Records	Does the institution maintain records of student complaints? ☒ YES ☐ NO
	If so, where? Title IX complaints are handled by the Title IX office and records are kept there. Other complaints (Housing, Safety and Security) are handled by the offices in which they are made, and that is spelled out in the University catalog. Other complaints:
	Does the institution have an effective way of tracking and monitoring student complaints over time? ☒ YES ☐ NO
	If so, please describe briefly: Procedures exist to follow up with complainants on their specific case as well as reports are generated at the institutional level by the office of Title IX and Equal Opportunity.
	Comments:

*§602-16(1)(1)(ix)

See also WASC Senior College and University Commission's Complaints and Third Party Comment Policy.

Review Completed By: Laura Palucki Blake

Date: 2/15/26

Transfer Credit Policy Review Form

Under federal regulations*, WSCUC is required to demonstrate that it monitors the institution's recruiting 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)	Does the institution have a policy or formal procedure for receiving transfer credit? ☒ YES ☐ NO
	If so, is the policy publicly available? ☒ YES ☐ NO If so, where? <u>College of Graduate Nursing Catalog (p.33)</u>
	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: Very few programs at WesternU accept transfer credit. Presently, transfer credit is assigned solely to Graduate Nursing Students in Distance Nursing programs. Other programs, such as College of Optometry, assign credit for advance standing programs but do not assign actual transfer credit.

*§602.24(e): Transfer of credit policies. The accrediting agency must confirm, as part of its review for renewal of accreditation, that the institution has transfer of credit policies that--

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

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

Review Completed By: Laura Palucki Blake

Date: 2/15/26

APPENDIX B: DISTANCE EDUCATION REVIEW FORM

SECTION A: For institutions with approved distance education programs:

BACKGROUND INFORMATION

1. Programs and courses to be reviewed (please list)
 - Master of Science in Nursing, College of Graduate Nursing
 - Doctor of Nursing Practice, College of Graduate Nursing
 - Emergency Nurse Practitioner Certificate, College of Graduate Nursing
 - Post-Master's Psychiatric Mental Health Nurse Practitioner Certificate, College of Graduate Nursing
 - Post-Master's Family Nurse Practitioner Certificate, College of Graduate Nursing
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)

Western University of Health Sciences (WesternU) currently offers two degree programs and three non-degree distance education programs through the College of Graduate Nursing (CGN).

Degree Programs

- Master of Science in Nursing (MSN), CGN
- Doctor of Nursing Practice (DNP), CGN

Non-Degree Programs

- Emergency Nurse Practitioner (ENP) Certificate, CGN
- Post-Masters Psychiatric Mental Health Nurse Practitioner (Post-Masters PMHNP), CGN
- Post-Masters Family Nurse Practitioner (Post-Masters FNP), CGN

The MSN program was established in 1997, followed by the DNP in 2008. The ENP certificate was introduced in 2018, Post-Masters FNP certificate in 2019, and Post-Masters PMHNP certificate in 2021.

WesternU is also in the process of transitioning certain distance education programs. The Master of Science in Health Sciences, originally established in 1096 as the University's second academic program, was approved for online delivery by WSCUC 2020. The program admitted its final cohort in Spring 2022, and was officially discontinued in July 2025.

Building on the foundation of the MSHS program, the University has developed a new Master of Healthcare Administration (MHA). This program has received approval from WSCUC as a substantive change and is scheduled to launch in Fall 2026 as a distance education program.

Five-year WesternU Distance Education Enrollment

Year	Headcount	FTE
2021/22	152	136.5
2022/23	153	138.7
2023/24	170	157.9
2024/25	206	189.5
2025/26	182	174.8

Five-year Distance Education Programs' Headcounts

Program	2021/22	2022/23	2023/24	2024/25	2025/26
DNP	14	12	9	39	64
MSN	45	53	73	51	12
ENP	4	4	3	10	5
Post-Masters FNP	49	28	31	27	17
Post-Masters PMHNP	27	44	49	77	84
MSHS	13	12	5	2	0
Total	152	153	170	206	182

Five-year Distance Education Programs' FTE

Program	2021/22	2022/23	2023/24	2024/25	2025/26
DNP	12	9.6	7	34.2	62.4
MSN	42.4	51.8	70.8	49.8	9.6
ENP	4	4	3	9.2	5
Post-Masters FNP	45.6	25.6	28.6	23.8	16.2
Post-Masters PMHNP	24.8	41.6	48.2	72	81.6
MSHS	7.7	6.1	0.3	0.5	0
Total	136.5	138.7	157.9	189.5	174.8

Enrollment in the Doctor of Nursing Practice (DNP) program has increased, attributable to the introduction of two additional concentrations in the 2024–2025 academic year.

Hybrid graduate-level courses integrate online learning with campus-based seminars, synchronous virtual sessions, and program-specific practice-intensive or clinical/procedural skills days. Distance education components include assigned readings, video-based instruction, asynchronous and/or synchronous discussion boards, group projects, written assignments, competency assessments, and other structured learning activities.

On-campus and synchronous virtual sessions incorporate didactic instruction, clinical training, and simulation-based workshop experiences, as well as opportunities for faculty and peer interaction, student presentations, competency assessments, and guest lectures.

3. Nature of the review (material to be examined and persons/committees to be interviewed)

Lines of Inquiry	Institution responds to questions and provides links to evidence (materials should be exhibits in appendices)	Review Team members enter findings and recommendations as appropriate
<i>Fit with Mission.</i> 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?	Currently WesternU's distance education programs are offered exclusively within the College of Graduate Nursing (CGN). These programs advance the University's mission by expanding access for students who are actively working in the nursing profession. Hybrid/distance education programs are planned in a manner consistent with all other programs throughout the university. The CGN maintains eight standing committees, including the Curriculum Committee, Education Technology Committee, and Program Evaluation and Assessment Committee, which play integral role in the planning, oversight, and continuous improvement of hybrid and distance education offerings. Hybrid/distance education programs are allocated in a manner consistent with all other programs across the University.	

<i>Connection to the Institution.</i> How are distance education students integrated into the life and culture of the institution?	Distance education students participate in on-campus student orientation and have access to the full range of student services available to all students.	
<i>Quality of the DE Infrastructure.</i> Are the learning platform and academic infrastructure of the institution conducive to learning and interaction between faculty and students and among students? Is the technology adequately supported? Are there back-ups?	CGN utilizes Canvas as its learning management system (LMS). Courses are structured to provide learners with the necessary information to achieve success, including learning objectives, comprehensive content, learning activities, assessment methods, and grading criteria.	

<i>Student Support Services:</i> 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?	Distance education students at WesternU have access to the same student support services as all WesternU students. They utilize the library's online resources and are supported by the University's advising, computing, and academic assistance services through phone and electronic communication. Counseling services are available via OptumHealth. Student satisfaction with these services is monitored through surveys, including the Graduating Student Survey, administered by the Office of Institutional Research and Effectiveness. Results indicate that distance education students are generally satisfied with both the availability and quality of support, comparable to their on-campus counterparts.	The review team specifically confirmed with Student Success/Retention that the Distance Learning programs benefit from the same levels of scrutiny and support as do the onsite programs.
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<i>Faculty.</i> 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?	Courses are primarily taught by full-time faculty, who maintain the same on-campus presence as all other institutional faculty. Faculty are responsible for developing and delivering the curriculum, as well as assessing student learning in accordance with institutional standards and professional accreditation requirements. Faculty receive comprehensive training, including participation in the WesternU Orientation Boot Camp for new faculty, access to ongoing professional development opportunities, and support from an instructional designer through the Center for Excellence in Teaching and Learning (CETL).	
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<i>Curriculum and Delivery.</i> 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.)	The CGN Curriculum Committee conducts thorough reviews of newly developed curricula, new courses, and courses undergoing major revisions. The committee evaluates all CGN curricula on a three-year cycle and submits its review findings and recommendations to the Dean and faculty. Programs are designed to be comparable to on-campus courses in both content and rigor. Distance education courses adhere to the same University credit hour policies as all other courses.	
<i>Faculty Initiated Regular and Substantive Interaction.</i> How does the institution ensure compliance with the federal expectation for “faculty-initiated, regular and substantive interaction”? How is compliance monitored? What activities count as student/instructor substantive interaction”?	Several courses may incorporate asynchronous and synchronous discussion sessions that promote collaborative learning between students and faculty. Synchronous sessions may be conducted via videoconferencing software, the Learning Management System, or other virtual platforms, depending on the program or course of study. Faculty provide feedback on assignments, hold office hours, and facilitate synchronous sessions, all of which constitute substantive student-instructor interaction.	

<i>Academic Engagement.</i> How does the institution ensure compliance with the federal expectation for “Academic Engagement”? How is compliance monitored? What activities contribute to academic engagement?	CGN hybrid/distance education students are expected to review their courses in Canvas LMS during the first week of each semester, familiarize themselves with each course syllabus, and remain engaged in all course activities throughout the semester. Students are required to attend and participate in all scheduled synchronous sessions. From the first day of the semester, students are expected to be online, actively engaged in learning activities, and, when on camera, dressed professionally as outlined in the College Catalog. Full attendance is required for all scheduled instructional periods, whether online or on-campus. Academic engagement is demonstrated through participation in activities such as discussion boards, written assignments, presentations, quizzes, and examinations.	
<i>State Licensure Requirements.</i> Describe, as appropriate, the institution’s process for disclosing to students how state licensure requirements are met by distance education programs, whether licensure requirements are not met by programs, or whether the institution has not determined where licensure requirements are met by the programs.	Individuals who complete the Post-Master FNP, Post-Master PMHNP, MSN, DNP, ENP are eligible to apply for a national nursing certification examination through the respective organizations and receive state recognition. (CGN catalog 2025-2026, p. 9)	See also: www.westerny.edu/nursing/about/departments-of-education

<i>Student Identification Verification and Privacy.</i> What is the institution's process for student verification, e.g., a secure login and pass code; proctored examinations; other technologies or practices that are effective in verifying student identification? What precautions are taken by the institution to protect technology from cyber security intrusions on its or outsourced systems? Are additional student charges associated with the verification of student identity disclosed at the time of registration or enrollment?	The CGN curriculum includes courses that may require proctored outcome competency examinations. Faculty may choose to use online, remote proctoring services for quizzes or exams. The cloud-based systems are typically integrated with the Canvas LMS. The CGN Online Testing Policy can be found in the CGN Catalog (p.48). There are no additional student charges associated with the verification of student identity disclosed at the time of registration or enrollment.	
<i>Retention and Graduation.</i> 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 and graduation data are systematically collected by all programs and reported annually to the Board of Trustees. Graduation rates are available on the Academic Outcomes site. In 2025, CGN achieved an on-time graduation rate of 90.5%, exceeding the WesternU institutional average (84.2%).	Per the WesternU webpages, on-time graduation rates for the DNP and ENP programs are 50% and 70%, respectively. It is concerning to note, therefore, that enrollment in the DNP program has quadrupled in the past 5 years.

<i>Student Learning.</i> 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?	Student learning is assessed using methods comparable to those employed in on-ground courses. The CGN Program Evaluation and Assessment Committee, chaired by the CGN Director of Assessment, oversees these assessments in alignment with accreditation and institutional requirements. The results of student learning assessments are detailed in Standard 2 of the Institutional Report and are available in Exhibit B-S2.06. 2021-2023 <i>Institutional Learning Outcomes Assessment Report</i>. Board Pass Rates are also available on the Academic Outcomes Site.	First-time Board pass rates are generally excellent.
<i>Contracts with Vendors.</i> 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 <i>Agreements with Unaccredited Entities</i>?	There are no arrangements with outside vendors concerning the infrastructure, delivery, development or instruction of courses.	

<i>Quality Assurance Processes:</i> 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?	Quality assurance processes encompass PLO-ILO assessment, programmatic and professional accreditation, and comprehensive program review. The PLO-ILO assessment and program review are applied consistently to distance education programs and courses, as relevant evidence—such as student work and feedback—can be collected electronically. The results of program review, assessment, and accreditation activities provide valuable evidence supporting the educational effectiveness of distance education programs.	The University Assessment Committee monitors ILOs for the Distance Learning programs equivalently to those of the on-site programs
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Name of reviewer/s: James Jacobs

Date/s of review: 3/31/26

OFF-CAMPUS LOCATIONS REVIEW-TEAM REPORT APPENDIX

Institution: Lebanon, Oregon campus of Western University of Health Sciences

Type of Visit: Reaffirmation of Accreditation

Name of reviewer/s: Gayle Copeland PhD (chair) and James R. Jacobs MD PhD

Date/s of review: March 4, 2026

A completed copy of this form should be appended to the team report for all visits in which off-campus sites were reviewed¹. One form should be used for each site visited. Teams are not required to include a narrative about this matter in the team report but may include recommendations, as appropriate, in the Findings and Recommendations section of the team report.

1. Site Name and Address

Western University of Health Sciences
College of Osteopathic Medicine of the Pacific ("COMP")-Northwest ("COMP-Northwest")
200 Mullins Dr.
Lebanon, OR 97355

Western University of Health Sciences
College of Health Sciences ("CHS")-Northwest ("CHS-Northwest")
2665 S. Santiam Highway
Lebanon, OR 97355

The two Lebanon programs are approximately 2.2 miles apart.

2. Background Information (number of programs offered at this site; degree levels; FTE of faculty and enrollment; brief history at this site; designation as a branch campus standalone location, or satellite location by WSCUC)

At COMP-Northwest, established in 2011, WesternU offers exclusively the Doctor of Osteopathic Medicine (DO) degree. COMP-Northwest is designated by WSCUC as a branch campus. Approximately 40 basic science, research, and clinical faculty serve the COMP-Northwest campus, with some of these having joint responsibilities at Pomona. Additionally, COMP-Northwest has many sites in Oregon, California and throughout the Pacific Northwest for clinical rotations (in years 3 and 4). The DO program is a 4-year curriculum and is accredited by the American Osteopathic Association Council on Osteopathic College Accreditation (COCA). One hundred students per year are admitted to the COMP-Northwest program, per COCA accreditation standards..

At CHS-Northwest, WesternU offers exclusively the Doctor of Physical Therapy (DPT) degree. The facility and program opened in 2021. There are approximately 20 program faculty for the CHS-Northwest campus, plus many sites for clinical rotations. The 3-year DPT program is accredited by the Commission on Accreditation in Physical Therapy Education. The program is accredited to enroll approximately 60 students per year but is currently enrolling approximately 40 students per year.

Note that WesternU also offers the DO and DPT degrees (and others) at its Pomona, CA campus.

3. Nature of the Review (material examined and persons/committees interviewed)

Review included:
Tours of both Oregon academic buildings.

¹ See Protocol for Review of Off-Campus Sites to determine whether and how many sites will be visited.

Conversation with Oregon campus Site Deans (COMP-Northwest and CHS-Northwest)
 Conversation with representatives from Oregon campus IT, finance, and physical plant.
 Conversation with representative clinical directors, faculty, and clinical rotation coordinators.
 Conversation with students from CHS-Northwest (in person) and COMP-Northwest (via zoom).
 Conversation with representatives from financial aid, student services, LEAD, CDHP, and library.
 Conversation with community supporters and two recent alumni.

Materials examined included WesternU's website, Report of the Western University of Health Sciences for Reaffirmation of Accreditation, ISLO Project Overview and Draft v.1, many additional documents in the Box folder.

Lines of Inquiry	Observations and Findings	Follow-up Required (identify the issues)
<i>For a recently approved site.</i> Has the institution followed up on the recommendations from the substantive change committee that approved this new site?	N/A	
<i>Fit with Mission.</i> How does the institution conceive of this and other off-campus sites relative to its mission, operations, and administrative structure? How is the site planned and operationalized? (CFRs 1.2, 3.1, 3.5, 4.1)	There is abundant evidence that the Lebanon programs are consistent with, and supportive of, WesternU's mission. One example (humanism) was demonstrated to the reviewers very poignantly while touring the gross anatomy lab where we learned of the annual Doner Memorial Service, where families of persons who donated anatomic specimens gather with students, faculty, and staff for a celebration of life and generosity. The institution's commitment to serve rural and underserved communities is evident from the rural location of the Lebanon campus per se but also in the sites available across Oregon/Pacific Northwest and California for DO and DPT clinical rotations. Nearly 60% of WesternU's DO graduates enter primary care residencies. The Lebanon community embraces WesternU not just as an economic engine but also as welcomed members of community, such as in inviting students to their homes for Thanksgiving meals.	
<i>Connection to the Institution.</i> How visible and deep is the presence of the institution at the off-campus site? In what ways does the institution integrate off-campus students into the life and culture of the institution? (CFRs 1.2, 2.10)	The Lebanon campus is exquisitely and inexorably coupled with the Pomona campus. Classroom teaching in the DO programs are often jointly	Unclear why COMP-Northwest dean is titled "Site Dean" reporting to the COMP & COMP-Northwest Dean but CHS-Northwest dean is titled. "Dean" reporting to the provost. In a follow up with

	streamed and recorded between the Lebanon and Pomona campuses. (Course streaming is not permitted by the terms of the DPT program accreditation, which require in-person instruction only.)	the provost in Pomona, she indicated that this structure is required by the professional accrediting body.
<i>Quality of the Learning Site.</i> How does the physical environment foster learning and faculty-student contact? What kind of oversight ensures that the off-campus site is well managed? (CFRs 1.8, 2.1, 2.5, 3.1, 3.5)	The Lebanon DO and DPT facilities are expansive and impressive. Examples of student-centered spaces include lockers, informal gathering spaces, private and group study rooms, food pantries, microwaves, and ample parking. Both facilities have dedicated facilities management teams. During the visit, all spaces were observed to be immaculately clean and well maintained. At the DPT facility, and worthy of special mention, a large informal student gather space on the ground floor is circumferentially surrounded by faculty and senior staff offices, facilitating easy engagement between faculty and students. The DO and DPT programs both offer impressive research opportunities for their students. Research posters are on display throughout both Lebanon facilities. A yearly joint research symposium is held jointly between the DO and DPT programs. IRB functions are seated at the Pomona campus. Of note, WesternU very recently purchased the COMP-Northwest (DO) facility, which they had been leasing.	
<i>Student Support Services.</i> What is the site's capacity for providing advising, counseling, library, computing services and other appropriate student services? Or how are these otherwise provided? What do data show about the effectiveness of these services? (CFRs 2.11-2.13, 3.6, 3.7)	Formal and informal advising is evident in both Lebanon programs. The institution's Learning Enhancement & Academic Development (LEAD) resources, which include academic advising, peer tutoring, and others, are equally available at both the Lebanon and Pomona campuses. Unlimited on-site mental health counseling is available for all students.	It was not clear from the Lebanon campus interviews whether COMP-Northwest is a direct provider of clinical services (specifically at the WesternU "Oliver Station" clinic in Portland, OR) or whether COMP-Northwest provides physician staff for a facility operated by another entity.

	Library services for the Lebanon programs are available online (there is a physical library at the Pomona campus). A signature of COMP-Northwest are the facilities and pedagogy for hands-on clinical simulation and clinical skills building. These activities are incorporated into the DO curriculum beginning in year 1. Didactics include both formative and summative assessments. A signature of the Lebanon DPT program is the Practical Applications Lab (PALs), where students work with volunteer patients under the direct supervision of a DPT-Oregon program faculty member. Interviewed Lebanon-area community members raved about the positive impact of PALs.	
<i>Faculty.</i> Who teaches the courses, e.g., full-time, part-time, adjunct? In what ways does the institution ensure that off-campus faculty is involved in the academic oversight of the programs at this site? How do these faculty members participate in curriculum development and assessment of student learning? (CFRs 2.4, 3.1-3.4, 4.6)	Courses are taught by full-time and part-time faculty and by highly specialized technical staff. The DO and DPT programs also make extensive use of facilities (e.g., hospitals) and clinics for clinical rotations, consistent with all healthcare training programs. Student Learning Outcomes for the Lebanon programs are assessed wholly on par with the like Pomona programs. Outcomes for the Lebanon programs are equal to, and are in some cases better than those at Pomona. Ultimate Board pass rates and post-graduation placement rates are uniformly excellent at both campuses.	
<i>Curriculum and Delivery.</i> Who designs the programs and courses at this site? How are they approved and evaluated? Are the programs and courses comparable in content, outcomes and quality to those on the main campus? (CFR 2.1-2.3, 4.6)	Lebanon courses and curricula are designed by Lebanon faculty in close collaboration with Pomona faculty in their respective disciplines and in accordance with the respective discipline-specific accreditation standards. For the DO program in particular, as stated previously, there is intentional overlap in curricular design so that some courses can be	

	consumed by both locations simultaneously. Note also that the Lebanon faculty have equal access to the Center for Excellent in Teaching and Learning (housed at Pomona).	
<i>Retention and Graduation.</i> What data on retention and graduation are collected on students enrolled at this off-campus site? What do these data show? What disparities are evident? Are rates comparable to programs at the main campus? If any concerns exist, how are these being addressed? (CFRs 2.6, 2.10)	The Lebanon DPT program has an on-time graduation rate of 87% (compared to 78.6% at the Pomona campus). The DPT program has a first-time licensure pass rate of 84.6%, with an ultimate pass rate of 96.2%, but the institution has not provided data for Lebanon and Pomona separately. The Lebanon DO program has an on-time graduation rate of 86.1% (compared to 79.4% at the Pomona campus). Western University's first-time pass rates for the DO Complex-USA Board exams are equal to or above national averages, but the institution has not provided data for Lebanon and Pomona separately. In 2025, 100% of Western University DO students matched into a postgraduate residency program. For two consecutive years, U.S. News & World Report has named Western University COMP and COMP-Northwest as a Tier 1 institution for primary care training.	
<i>Student Learning.</i> How does the institution assess student learning at off-campus sites? Is this process comparable to that used on the main campus? What are the results of student learning assessment? How do these compare with learning results from the main campus? (CFRs 2.6, 4.6, 4.7)	Institutional Student Learning Outcomes apply equally to the Lebanon programs. See also Retention and Graduation section above.	
<i>Quality Assurance Processes:</i> How are the institution's quality assurance processes designed or modified to cover off-campus sites? What evidence is provided that off-campus programs and courses are educationally effective? (CFRs 4.4-4.8)	There are many examples demonstrating that quality assurance processes extend to the Lebanon campus. For example, 1. The Lebanon DO and DPT programs are equal participants in Pomona's Academic Program Review and 2. The DO and DPT programs have discipline-specific national accreditation (each program being in good standing).	