May 10, 2013

Western Association of Schools and Colleges
Accrediting Commission for Senior Colleges and Universities
985 Atlantic Avenue, Suite 100
Alameda, CA 94501

Dear Members of the Commission:

First, I would like to thank the Commission for allowing me the opportunity to respond to the Report of the WASC Special Visit Team (dated March 6-8, 2013). The purpose of this response is to provide important commentary and context for those reading the Team's report. As noted in the following areas, I summarize additional progress, as well as ongoing activities related to issues raised during the special visit. While the University may not fully agree with every conclusion made within the report, we certainly appreciate the time and effort the Team invested in exploring our campus community. WesternU is committed to carefully reflecting on the Team's insights and understands the important role the reaffirmation process plays in our quality improvement efforts.

Special Visit Concerns

The basis for the special visit was a set of five recommendations given at the conclusion of the WesternU's Educational Effectiveness Review in 2010. These recommendations consisted of:

- Developing and implementing program review
- Moving to the next level on student learning assessment
- Building support for a culture of evidence
- Planning and providing resources for institutional change and growth
- Enhancing the collective voice of faculty in governance.

Since 2010, the University invested a great deal of time and resources toward improvement in each of these areas. For instance, to help lead our program review and assessment processes, WesternU's Provost assembled the Program Review/Assessment Committee. A Data Standards Committee was put together to help improve our ability to access and use institutional data. The Office of Institutional Research and Effectiveness (IRE) was reorganized and augmented to help fill voids in program review, assessment, and to effectively build a culture of evidence. Modifications to the faculty governance structure, which were underway prior to 2010, continued to evolve.

Overall, I was pleased to find that the special visit report acknowledges improvement in each of the five areas as a result of our efforts. The Team commended the institution for the “development of a
program review process and completion of three program reviews." The team verified that a calendar for reviews was now in place and that "some results are being used appropriately." With respect to the assessment of university student level outcomes, the Team confirmed that a process was in place and "that a good deal of progress had been made."

Improvements in our capacity to support a culture of evidence were also substantiated by the report. The University’s adoption of an Operational Data Store has begun to improve the “utilization of data for decision-making.” Interviews with data users across the WesternU campus revealed that “significant progress had been made in making reliable data available.” And, while initial findings indicated that our institutional database (Banner) was not optimized to support the University’s growing research infrastructure, the Team was able to confirm that this issue was being addressed.

With respect to planning and providing resources for growth, the Team confirmed that WesternU’s strategic planning process focuses on bolstering institutional infrastructures and program quality. Moreover, while the Team suggested that we do a better job of aligning program review findings with strategic planning, they concluded that “the proposed strategic planning process will foster unit alignment and help establish institutional priorities.”

Although the evaluation of faculty progress on governance was considerably less sanguine, the Team did report improvement in this area as well. The team cited the Senate’s work on important university issues such as the development of a university syllabus template and policies on credit hours and intellectual property. Though not mentioned in the report, the Senate also worked on revising a policy for scholarly leave. In March, following the site visit, the policy on scholarly leave was submitted to a vote and approved by the faculty assembly.

**Special Visit Recommendations**

With respect to the Team’s Recommendations, I believe the following information, by area, is important in understanding the positive conditions created as a result of efforts made since 2010:

**Faculty Governance**

“Mobilize faculty and administrators in an urgent and united effort to create an effective system of shared governance in which faculty exercise leadership and act consistently to ensure both academic quality and appropriate maintenance of the institution’s educational purposes and character, including curriculum, academic policies, peer review, and grievance policies at the University level.” (CFRs 1.3, 3.8, and 3.11)

The Team was disappointed at the rate in which change is occurring on the topic of faculty governance at WesternU. The University shares some of this concern. Changes to the faculty governance structure, which were initiated a few years ago, have been slow to develop. Faculty committees have yet to be evaluated. Wide-scale participation by the faculty at-large is lower than what was anticipated.

While it may, on the surface, appear that little progress has been made, our efforts to grapple with this issue have been significant and centered on many of the complex issues suggested by the site visit team. For example, in considering curriculum standardization/oversight at the University level, our past and current policy grants a high degree of deference to the corporate decision of the faculty at the College and program level. Each of these are unique, autonomous health professions, with
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curriculum developed and reviewed in conjunction with the professional standards generated by their respective accrediting bodies and licensure requirements. After much discussion and soul searching, there is a dawning realization by faculty and administration that such a deferential approach is the most appropriate solution to insuring a vibrant, quality health professions education program. The composition of our faculty, as another example, is relatively unique in comparison with a more liberal arts or comprehensive University model. The majority of WesternU faculty hold a clinical doctoral degree in a wide variety of health professions that bring unique skills and approaches to the total health of patients (both human and animal). They are duly authorized and expected to evaluate the credentials of their colleagues at the discipline level, with regards, not only to their roles as more traditional educators, but also for the quality of the patient care they render. So again, great deference must be granted to them at the college level. As a result, suggestions to create a strong centralized faculty oversight process for curriculum and peer review at the institutional level are necessarily problematic in this critical context.

Other issues raised in the Team report appear to be somewhat exaggerated. For instance, allusions to issues surrounding inadequate faculty meeting space do not appear to be well founded. For the past two years, the College of Veterinary Medicine has given the Senate permission to occupy their largest conference room for meetings. This room was specifically chosen because it is equipped with media technology that allows faculty representatives from our Oregon campus to participate in meetings. Furthermore, discussions with the Faculty Senate Chair and the WesternU Facilities department did not reveal any complaints about meeting space. At no time has the Senate had to cancel a meeting due to lack of meeting space.

With respect to the Team’s suggestions for faculty input on our Interprofessional Education Program (IPE), the curriculum is already governed by the IPE Implementation Committee. This committee is comprised of the Faculty Curriculum Committee Chair of each college, as well as academic deans. Finally, I should note that grievance policies, covering common grievance issues, are already in place at the university level.

Nevertheless, we agree that faculty governance is a topic worthy of our attention. In particular, the issues of lack of trust raised in the team report are particularly disconcerting. Significantly, some of what may appear to be distrust has, to considerable extent, stemmed from the rather minimalistic nature of the current Faculty Handbook. Both the Provost and the leadership of the Faculty Senate agree that a more elaborated handbook is required. It is crucial for all faculty to better understand their respective roles and responsibilities with respect to current university processes within their college organization, within the Faculty Assembly, and as representatives of the faculty voice in the development and implementation of general University policies and practices. I agree with the Team’s assessment that these are important issues that should be addressed. The University will participate in a HERI Faculty Survey later this year to help evaluate barriers that pertain to faculty participation and satisfaction. The upcoming results will be compared to those from 2008 to determine longitudinal change. Items of particular interest to WesternU can and will be added to this survey in consultation with university administration and the Faculty Senate.

Growth

"That the University defer further development of new programs in order to address significant resource needs (space, equipment, and infrastructure) related to commitments made to colleges and faculty to support the University’s goal."

(CFRs 1.8, 2.8, 3.5, and 4.2)
WesternU takes very seriously issues of capacity, as we fully understand the importance of having in place the proper infrastructure to facilitate successful educational programs. As cited in the team report, the University has a variety of systems in place to complement university planning. Academic Programs and Operational Units report to the Board of Trustees on a regular basis. As previously mentioned, the ongoing strategic planning process is focused on infrastructure and quality. Moreover, institutional data, and professional accrediting body reports indicate that WesternU’s academic infrastructure has kept pace with our growth. Our student to faculty ratio is lower today than it was five years ago, and is considered within appropriate ranges. Academic support staff numbers are outpacing faculty numbers. Furthermore, central administration support service staff such as the library, Institutional Research, Financial Aid, and IT has grown by 49% over the past five years.

After careful consideration, I found the suggestion to defer the development of new programs to be somewhat troubling as there was scant evidence within the report to support the recommendation. There appeared to be no equipment deficiencies cited within the body of the report. As previously mentioned, issues of faculty meeting space appear to be somewhat exaggerated. Planned research labs have been built and a process is in place to ensure their effective utilization. Looking ahead, the University is actively pursuing potential acquisitions of local buildings to meet any lingering requests for space, as well as meet anticipated strategically planned needs for the next three years.

Most importantly, the recommendation to postpone the development of new programs appears to be overly general. While our strategic plan has repositioned our current focus on new programs, the University has appropriate interest in two areas of national concern: an online degree program in patient safety and a Ph.D. program in translational research. We have over the past three years been developing the infrastructure and capacity for these small scale, but critically needed programs. The WASC substantive change process is already designed to evaluate such issues of capacity. We believe there should be no blanket statement to limit new program endeavors and feel that the substantive change process should be allowed to run its course.

Program Review

"Continue to refine program review processes including directions for writing program review reports, clarify roles and responsibilities of reviewers, and strengthen feedback and mechanisms for all participants in the program review process. Furthermore, demonstrate and record how results of program review are integrated into college and institutional planning and budgeting." (CFRs 1.3, 4.4, 4.6; and 4.7)

The University agrees with and appreciates the Team’s observations about our program review process. Since the March site visit, the Program Review/Assessment Committee has had extensive conversations about the recommendations on program review contained within the report and plans to strengthen the process. To gather feedback, the committee Chair has had discussions with previous program review participants, including program reviewers.

Specific actions being taken include an update of the review process guidelines to ensure roles are more clearly defined. The Committee is also developing a more robust set of templates and rubrics to support the process. Included in these documents will be a “closing the loop” checklist that will outline reviewed programs recommended uses for their program review documents (e.g., budget meeting, strategic planning, etc.). Documents for reviewed programs will be published on the WesternU intranet. With the determined effort of the Program Review/Assessment Committee, we expect the program review process to become further institutionalized, and to yield important data to strengthen our academic programs.
Data Warehouse

"Enhance the existing data warehouse by adding information that may reside in individual colleges to support institutional decision making (e.g., data on alumni employment and facilities and space-planning data across all of the University's colleges)." (CFRs 3.6, 3.7, 4.2, and 4.3)

The University agrees with the team's recommendations for enhancing our existing data warehouse. The Data Standards Team, which consists of representatives from the colleges and related university offices (e.g., HR, Advancement, Student Affairs, etc.), has conducted a preliminary evaluation of data needs. The team will soon begin an internal scan that will explore data needs from the campus at large. This process is scheduled to conclude in September of this year. With respect to employment data, the Director of IRE is working with the Alumni Office and college deans to develop the necessary methods and definitions.

Conclusion

Western University of Health Sciences has a proven track record for success. Our graduation and licensure rates are among the highest in the nation. Our student loan default rate (approximately 1%) indicates that our graduates are finding and maintaining high levels of compensation from their jobs. In 2012, the University was recognized by The Chronicle of Higher Education as one of the Top 103 Colleges to Work For. We are extremely proud of the WesternU students, faculty, and staff that contributed to our stellar record and notable accomplishments.

In closing, allow me to thank the Commission and the Team for their efforts. Peer review is a necessity, and we at the University are committed to applying process improvements to maintain, and even surpass, our achievements.

Sincerely,

Philip Pomerantz

PP/jr

cc: Board of Trustees