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Ralph A. Wolff

March 3, 2010  
Phillip Pumerantz  
President  
Western University of Health Sciences  
309 E. Second Street  
Pomona, CA 91766-1854

Dear President Pumerantz:

At its meeting on February 17-19 2010, the Commission considered the report of the Educational Effectiveness Review (EER) team that visited the Western University of Health Sciences (WUHS) on October 14-16, 2009. The Commission also had access to the University's EER report and related exhibits, and to material from the Capacity and Preparatory Review (CPR) conducted on March 19-21, 2008, including the team report and the action letter dated July 9, 2008. The members of the Commission panel appreciated the opportunity to discuss the review with you and Gary Gugelchuk. The information that you provided and your observations about WUHS and the review were very helpful.

The Commission was pleased with the engagement of the WUHS community in the reaffirmation process and with the alignment of the two institutional reports with the Institutional Proposal. It is clear that WUHS utilized the review process to address important issues and took a careful, systematic approach to the review, developing research questions, identifying studies from literature relevant to these questions, and examining institutional practices. These inquiries on the chosen themes of Evidence-Based Practice, Humanistic Care, and Quality Assurance Processes produced thoughtful recommendations for action that could provide a roadmap for progress. Progress also has been made on areas highlighted in the Commission's letter of June 24, 2008, although in some areas noted below, further progress will be needed.

The university's final interpretive component in its EER report provided an overview of both progress and the remaining challenges. However, the university's EER report was sometimes more "descriptive" and "less analytical and self-reflective" than is desirable, and it lacked a commitment and plans to follow through on the recommendations that emerged from the review.

The Commission commends WUHS for its strength in several key areas: 1) the mission-based commitment to humanistic care and compassion for health professionals, and the emphasis on evidence-based practice; 2) the innovative work being done to develop inter-professional education across program curricula, which may serve as a model in health care education; 3) advances in technology that are helping to improve and sustain student learning; 4) the new initiative designed to recruit under-represented minorities to the student population; and 5) the engagement and support of faculty and staff members who are committed to student learning and success.

The Commission also acknowledges the work that WUHS is doing in assessment of student learning. During the period of this review, WUHS adopted student learning outcomes at the program and institutional level, developed direct and indirect means to

assess learning, and started to monitor and use the data derived from this work for improvement. As noted by the team, the faculty is deeply committed to assessment and has developed considerable expertise, and “a wide variety of direct evaluation measures” are employed, resulting in “feedback to students and summative evaluation of outcomes.”

In accepting the team report, the Commission endorsed its findings and recommendations and emphasized the following areas for further attention and development:

**Developing and implementing program review.** In order to meet WASC expectations for educational effectiveness, institutions are expected to have “a deliberate set of quality assurance processes at each level of institutional functioning, including... periodic program review...” (CFR 4.4) WUHS had historically relied on specialized accreditation, which most of its programs have, to fulfill this longstanding expectation. The lack of systematic program review was noted by the CPR team and highlighted in the Commission’s action letter of July 2008, and WUHS only recently adopted a program review process. The first program review using the new process had not yet been completed at the time of the EER visit. Therefore, the efficacy of the process cannot yet be evaluated. Further, cycles of reviews of all the programs are not clear and the utilization of results of program reviews for improvement has not been established. (CFRs 2.7, 4.4) The Commission fully supports the team’s recommendation that WUHS “accelerate the implementation and evaluation of this essential quality assurance process.”

**Moving to the next level of student learning outcomes assessment.** Also essential to an institution’s educational effectiveness is a comprehensive process for assessment of student learning, evaluation and improvement at the institutional and program levels and in co-curricular activities. At this stage of the review process, institutions are expected to produce evidence that demonstrates what students are learning and confirms that programs are achieving their intended outcomes. While WUHS can show comparatively high retention and graduation rates, excellent licensure examination pass rates and other some other key indicators, it is encouraged to address additional areas as it moves to a “developed” or “highly developed” level of effectiveness. Although assessment of student learning is very effectively handled at the programmatic level, more work is needed to assess the recently adopted university learning outcomes and to systematically analyze, interpret, and make use of evidence derived from assessment. Assessment of learning and effectiveness in the university’s co-curricular activities has not yet been considered by the faculty and staff. (CFRs 2.6, 4.4, 4.6, 4.7)

**Building support for a culture of evidence.** In order to sustain the institution’s system for enhancing educational effectiveness and improving student learning, WUHS needs to further develop faculty and administrative expertise. In addition, there is need to build out an infrastructure capable of collecting and retrieving useful and accurate data in a timely fashion for dissemination and use. As noted by the team, data are “difficult to retrieve and analyze” because of the lack of centralization and accessibility. The lack of professional expertise in institutional research also has impaired WUHS’ ability to meet this expectation. Further, the lack of a systematic and centralized institutional research structure encourages the schools to operate semi-autonomously, hampering university-wide strategic planning and use of evaluative evidence for improvement across the institution. As noted in the team report, an analysis of disaggregated retention and graduation data across student groups and programs was not readily available or well analyzed, although these key indicators are an essential part of educational effectiveness and WASC’s expectations. (CFRs 2.6, 2.10, 4.1, 4.3, 4.4)

**Planning and providing resources for institutional change and growth.** The Commission acknowledges WUHS' growth and expansion into a comprehensive health sciences university and recognizes the effective manner in which the new schools were launched and new facilities added. WUHS has also added the generating of research to its mission, creating new and very different expectations for faculty members. The addition of new faculty and staff and the transition in leadership, which will occur before the next WASC visit, contribute to this dynamic scenario. Plans also call for more enrollment growth and an off-campus, out-of-state site where a full degree program is offered. WUHS is to be commended for operating in a well-managed and fiscally sound manner throughout this period of expansion.

However, the Commission shares the team's concerns that resources for all of these new endeavors may not have kept pace with their implementation, and that plans to accommodate new and planned initiatives, changes, and program growth are not yet in place. The Commission urges WUHS to evaluate carefully, in collaboration with faculty and staff, the adequacy of resources for both academic and non-academic units, and for initiatives like research and interprofessional education. Further, detailed plans are needed to ensure the success of the many transitions and the further growth that are expected in the next five to ten years. (CFRs 1.2, 3.1, 3.5, 4.1-4.3)

**The collective voice of faculty in governance.** The action letter that followed the 2008 Capacity and Preparatory Review called for "meaningful progress on more effective communication among campus constituencies, with an appropriate role for the faculty in governance at the university level." The role of faculty has been a challenge for WUHS for many years; it was also the subject of a recommendation in the Commission's action letter of 2001, which called for a more inclusive form of governance.

The team found that "communication across University constituencies had improved" but that a means for "regular dialog between senior faculty leadership and administration" was lacking and that proposed changes for a new system of faculty governance had been stalled. Given that WUHS is now more than 30 years old and has matured into a comprehensive health care institution with more than 2000 students, nine schools, and 130 full-time faculty members, the Commission has deep concerns with the team's finding that "the development of a faculty voice in academic affairs is still in its infancy." An active voice of the faculty at the university level (apart from individuated professional school faculty) is needed to establish standards and policies and to provide a formal means for communicating about ongoing challenges concerning faculty evaluation, promotion, and workload. The Commission recognizes that the faculty in each school is deeply involved in oversight of the academic programs at the school level, but urges immediate and sustainable action on a governance model that ensures an appropriate faculty role at the institutional level. A clear delineation of the roles and responsibilities of the faculty in governance and decision making and a climate that supports the proper role of the faculty in governance are both needed. (CFRs 1.3, 3.2, 3.11, 4.6, 4.7)

In conclusion, the Commission acted to:

- 1) Receive the Educational Effectiveness Review report and reaffirm the accreditation of Western University of Health Sciences.
- 2) Schedule the Capacity and Preparatory Review for fall 2016 and the Educational Effectiveness Review for spring 2018. The Institutional Proposal will be due in fall 2014.

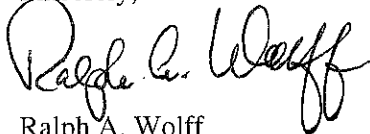
- 3) Schedule a Special Visit for spring 2013 to address the issues cited in this action letter, in particular: a) the further development and implementation of program review, including completed reviews and refinements to the process to address the issues raised in this letter and the team report; b) progress in assessing institutional-level student learning outcomes and co-curricular programs; c) the development of an institutional research function that collects and provides useful, complete and accurate data for decision making and planning; d) updates on the resources supporting new initiatives and programs, and updated strategic plans; and e) resolution of longstanding issues concerning the role of faculty in governance, with an effective and sustainable system in place.

In taking this action to reaffirm accreditation, the Commission confirms that the Western University of Health Sciences has satisfactorily addressed the Core Commitments to Institutional Capacity and Educational Effectiveness, and has successfully completed the three-stage review conducted under the Standards of Accreditation. Between this action and the time of the next review, the institution is expected to continue its progress, particularly with respect to educational effectiveness and student learning.

In accordance with Commission policy, a copy of this letter will be sent to the chair of WUHS' governing board in one week. The Commission expects that the team report and this action letter will be widely disseminated throughout the institution to promote further engagement and improvement, and to support the institution's response to the specific issues identified in them.

Finally, the Commission wishes to express its appreciation for the extensive work that the university undertook in preparing for and supporting this accreditation review. WASC is committed to an accreditation process that adds value to institutions while assuring public accountability, and we are grateful for your continued support of our process. Please feel free to contact me if you have any questions about this letter or the action of the Commission.

Sincerely,



Ralph A. Wolff  
President and Executive Director

RW/kb/tc

cc: Sherwood Lingenfelter  
Gary Gugelchuk, ALO  
Warren Lawless, Board Chair  
Members of the EER team  
Teri Cannon