

**REPORT OF THE WSCUC TEAM  
For Reaffirmation of Accreditation**

**Golden Gate University**

**March 11-14, 2019**

Team Roster

**Dr. Jonathan Reed, Chair**

Provost and Vice President for Academic & Student Affairs, University of La Verne

**Dr. Shawna L. Lafreniere, Assistant Chair**

Associate Professor of Leadership and Organizational Psychology, Azusa Pacific University

**Mr. Christopher Berk, Team Member**

Chief Financial Officer, National University

**Dr. Cecile Lindsay, Team Member**

Director, Doctoral Incentive Program, CSU Office of the Chancellor

**Dr. Michael Mahoney, Team Member and Acting Chair for the Accreditation Visit**

Former Provost, CSU East Bay

Former Dean of Engineering, CSU Long Beach

**Dr. Barbara Gross Davis, WSCUC Staff Liaison**

The team evaluated the institution under the 2013 Standards of Accreditation and prepared this report containing its collective evaluation for consideration and action by the institution and by the WASC Senior College and University Commission (WSCUC). The formal action concerning the institution's status is taken by the Commission and is described in a letter from the Commission to the institution. This report and the Commission letter are made available to the public by publication on the WSCUC website.

## TABLE OF CONTENTS

### SECTION I – OVERVIEW AND CONTEXT

- A. Description of Institution and Accreditation History pg. 3
- B. Description of Team’s Review Process pg. 5
- C. Institution’s Reaccreditation Report and Update: Quality and Rigor of the Report and Supporting Evidence pg.6

### SECTION II – EVALUATION OF INSTITUTIONAL ESSAYS

- A. Component 1: Response to previous Commission actions pg. 6
- B. Component 2: Compliance: Review under WSCUC Standards and compliance with federal requirements; Inventory of Educational Effectiveness Indicators pg. 7
- C. Component 3: Degree Programs: Meaning, quality and integrity of degrees pg. 17
- D. Component 4: Educational Quality: Student learning, core competencies, and standards of performance at graduation pg. 19
- E. Component 5: Student Success: Student learning, retention, and graduation pg. 21
- F. Component 6: Quality Assurance and Improvement: Program review, assessment, use of data and evidence pg. 25
- G. Component 7: Sustainability: Financial viability, preparing for the changing higher education environment pg. 26
- H. Component 8: Optional essay on institution-specific themes pg. 27
- I. Component 9: Reflection and plans for improvement pg. 27

### SECTION III – FINDINGS, COMMENDATIONS, AND RECOMMENDATIONS FROM THE TEAM REVIEW pg. 28

- APPENDICES pg. 30
  - A. Federal Compliance Forms pg. 31
    - 1. Credit Hour and Program Length Review
    - 2. Marketing and Recruitment Review
    - 3. Student Complaints Review
    - 4. Transfer Credit Review
  - B. Off-Campus Locations Review pg. 38
  - C. Distance Education Review pg. 42

## **SECTION I – OVERVIEW AND CONTEXT**

### **A. Description of Institution and Accreditation History**

Golden Gate University (GGU) is a private, non-profit institution with roots in the San Francisco YMCA’s “night school” dating back to 1881. It moved to its current location in the heart of the San Francisco’s financial district in 1910, incorporated in 1923 as Golden Gate College, and obtained initial WASC accreditation in 1959 as a specialized institution in business, law, and related curricula.

The university serves a headcount of some 3,400 students in undergraduate and graduate professional degree programs through face-to-face, online, and blended formats. Most students study at the San Francisco campus, but there are two small satellite sites in San Jose and Seattle (with a teach out in currently underway for the Los Angeles site).

The American Bar Association-accredited School of Law offers a J.D. program (425 full-time students) as well as several LL.M.s along with an S.J.D. (to mostly part-time students). The Schools of Business, Taxation, Accounting, and Undergraduate Studies—collectively referred to as the “business schools”—serve approximately 600 full-time international and military/veteran students and 1,600 part-time students in several Masters degrees: Accounting, Accountancy, Advanced Financial Planning, Business Analytics, Business Management, Counseling Psychology, Finance, Financial Planning, Human Resource Management, Industrial-Organizational Psychology, Information Technology, Marketing, Project Management, and Taxation. In addition, GGU offers an Associate degree in general studies, and Bachelor degree completion programs for some 600 part-time students with degrees in Management and Business.

A twenty-two member independent Board of Trustees has fiduciary responsibility for the heavily tuition-driven institution, whose main asset is the land and building in the heart of the financial district. The board appointed the president in 2015, at a time when declining enrollments were presenting budgetary challenges. Over the past three years, there have been turnover in leadership team, capacity building in IT, and campus-wide strategic discussions on programs and planning. Amidst these challenges, GGU has remained committed to its historic mission, namely to serve working adults and prepare graduates “to lead and serve by providing high-quality, practice-based educational programs in law, taxation, business and related professions ... in an innovative and challenging learning environment that embraces professional ethics and diversity.”

GGU’s last reaffirmation of accreditation review was in 2011, and the Commission letter of February 18, 2011 reaffirmed accreditation and put GGU on an eight-year cycle with an interim report required in 2014. For its interim report, GGU was asked to address: program review and assessment of all units, retention and completion rates, and financial sustainability. The Interim Report Committee (IRC) received the interim report and noted progress in each area, requiring no further interaction with WSCUC except for the Mid-Cycle Review scheduled for spring 2015. The IRC recommended that GGU include in its upcoming 2018 institutional report detailed information on GGU’s finances and financial viability, efforts to diversify revenue streams, and changes in strategic directions as a result of a presidential transition that may impact finances, along with an enrollment management plan as well as any contingencies should targets not be reached.

In a letter dated April 10, 2018, the American Bar Association (ABA) found GGU’s School of Law “significantly out of compliance” with Standard 501b, namely high attrition

(above 20%) in relation to the incoming class's academic credentials. The ABA expected a report due on January 15, 2019, and for GGU to appear before the ABA Accreditation Committee in May 2019 to demonstrate compliance with the standards.

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

### **Offsite Review Activities**

GGU submitted its report and supporting documentation to WSCUC on September 1, 2018. The chair had a conversation with GGU's president on October 8, 2018, who provided an update on enrollments, new staffing, and strategic planning. Prior to the team phone conference on October 11, 2018, each member examined the materials and completed an independent assessment using the team worksheet provided by WSCUC. The compiled notes were then the basis for the team's conference call, which focused on potential items for discussion during the Offsite Review (OSR), held in Alameda on November 12-13. The team discussed and further examined GGU's documentation, identified lines of inquiry, and communicated this information to GGU's president, ALO, and leadership team via a videoconference on the final day of the OSR. The team also asked for additional documentation. Prior to the visit, the team reviewed requested institutional documents and compiled a draft report.

### **Accreditation Visit Activities**

The team conducted the onsite review on the GGU campus March 11-14, 2019. Because of an emergency, the chair was unable to participate in the Accreditation Visit (AV) in person though he was able to call in for some sessions. A team member served as onsite chair. During the visit, the team utilized the lines of inquiry that were created during the Offsite Review to

conduct interviews, examined institutional documents such as assessment findings, curriculum, institutional website, and reviewed the confidential email account.

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

The team concluded that GGU's institutional report was well-written and evidence-based, portraying accurately the condition of the institution. The team appreciated the brevity of the report, coupled with an appropriate number of appendices that were easy to navigate through links. The report included the required data exhibits and documentation to support assertions in the report. During the visit, the team found that there was broad involvement of stakeholders in the preparation of the report, but that faculty could have had more input into the report before it was finalized. The team's lines of inquiry from the Offsite Review were also addressed by GGU with supplemental documentation provided prior to the visit. According to interviews conducted by the team, the institution's self-review led to a greater understanding of its effectiveness, areas for growth and improvement, and strengthened student learning.

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

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

When the Commission reaffirmed GGU's accreditation in 2011, it asked for an interim report in 2014 to focus on 1) retention and completion, 2) assessment and program review, and 3) financial sustainability. The Interim Report Committee believed that progress had been in each of these areas but also recommended that GGU stress in its next institutional report attention to fiscal sustainability, including: "Detailed information on GGU's finances, including steps that are being taken to ensure financial viability, efforts to diversify revenue streams, trends

in net tuition revenue, and changes in strategic directions, if any, that as a result of a presidential transition may impact finances.” In addition, the Interim Report Committee asked for “[a]n enrollment management plan with contingencies should targets not be reached.”

GGU’s institutional report for reaffirmation provided a detailed update on the former two areas, with clear progress, in chapters 6 and 7, and used chapter 8 to focus on Sustainability: Financial Viability and Enrollment Management. The latter detailed changes in budgeting practices, renovation of facilities and leasing of space for an additional revenue stream, and a new strategic enrollment plan with an upgrade to the CRM. In addition to appointing a new president in 2015, GGU also added a new VP for Enrollment Strategy and Services and most recently appointed an interim CFO after the institutional report was submitted.

## **Component 2: Compliance: Review under WSCUC Standards and compliance with federal requirements; Inventory of Educational Effectiveness Indicators**

The team’s finding, which is subject to Commission review, is that GGU has provided sufficient evidence to demonstrate compliance with the four WSCUC standards. The following section describes the team’s review of evidence that led to the conclusion that all four standards have been satisfactorily addressed, although like all institutions, there are some areas at GGU needing improvement. Final determination of compliance with the Standards rests with the Commission.

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

GGU defines its institutional purposes and establishes educational objectives aligned with those purposes. Given its Bay Area location, its focus on adult learners, and its place in the

higher education community, the institution has a clear sense of its mission and the importance of its contribution to the public good. GGU posed an open-ended question about its university mission statement to full-time campus faculty and staff and there was "overwhelming support for its (the mission's) intent." (CFR 1.1)

There are key indicators of student achievement at the institutional, program, and course levels. The institution publishes its disaggregated retention/graduation rates on its website. (CFR 1.2) The university functions with academic freedom, transparency and integrity. However, it needs to improve its transparency and consistency in its human resource functions. (CFR 1.3)

The team commended GGU for the impressive diversity of its students, adjunct faculty, and staff. However, the team encourages GGU to take steps to increase the ethnic diversity of its full-time faculty, its board of trustees, and to add non-alumni to its board. (CFR 1.4)

Education is clearly the primary purpose of the institution, which is certainly autonomous from any external entities. (CFR 1.5) Comprehensively demonstrated in its report and appendices, the institution truthfully represents itself to its students and the public and has fair and equitable policies. (CFR 1.6) While GGU overwhelmingly uses sound business practices, the team has some concerns about GGU using university reserves to address its recent financial shortfalls. (CFR 1.7) The institution is strongly committed to open and honest communication with WSCUC. GGU has been open and forthcoming with all requests for information. (CFR 1.8)

Subject to the Commission's review, the team's overall finding is that the institution has provided sufficient evidence to demonstrate compliance with Standard 1.



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

### **Teaching and Learning**

The team carefully reviewed GGU's institutional report and its appendices, its catalog and course syllabi, comments captured from faculty and student interviews, observations from the onsite visit, the faculty policies and other documents and found sufficient evidence that the institution is in compliance with Standard 2. However, GGU needs to improve in several areas.

The team found evidence that GGU has paid close attention to the Standard 2 criteria since its last major WSCUC review. The team confirmed that the institution's programs are adequate for the degrees offered. The institution appears to have minimally enough full-time faculty with the requisite experience necessary for the type of courses and degree programs offered. Eighty percent of the courses in the business schools are taught by adjunct faculty while full-time faculty are responsible for most of the assessment and program reviews. Several full-time faculty outside of the law school said they were the only core members of their programs and claimed exhaustion. GGU may wish to consider hiring more full-time faculty or identifying strategies for engaging adjuncts in assessment and program review.

The institution's program reviews and other assessments help ensure that Standards are met, academic rigor is appropriate, and undergraduate/graduate differentiation is clear. (CFRs 2.1, 2.2, 2.2a, 2.2b) GGU's student learning outcomes (SLOs) and expectations are reflected in the pertinent documents. The faculty share responsibility for SLOs and other related standards but more core faculty might be needed to maintain this level going forward. GGU students are actively involved and challenged in their learning via assessments, projects, online discussions and signature assignments. Results of a survey indicate that a small number of faculty members

believe that academic rigor is inappropriate, but the team couldn't confirm this during the visit or through a review of course materials. The team notes that some of the senior leadership appears to lack knowledge of the idea and importance of SLOs and could benefit from understanding the role SLOs play in student learning. (CFRs 2.3, 2.4, 2.5)

GGU's assessment processes have improved and are on track to mature further over the coming years. Program reviews contain the appropriate measures although retention data should continue to improve over time. External reviews are conducted during disciplinary accreditations or with external evaluators. (CFRs 2.6, 2.7)

### **Scholarship and Creative Activity**

Full-time faculty members are provided with little financial support to keep them up-to-date in their disciplines (e.g., to attend conferences and to present scholarly/creative work). The team encourages increased support for reassigned time to give faculty opportunities to reflect on their teaching effectiveness, to develop plans for improvement, and to refresh their perspectives on student learning. Faculty evaluations include the four key elements, but the emphasis on scholarship could be increased. (CFRs 2.8, 2.9) The team recommends that GGU strengthen support for faculty professional development and scholarly activities. (CFR 3.3)

### **Student Learning and Success**

GGU supports the needs of its students but there is some room for improvement. The Law school attrition rate has been reasonable given its non-traditional student population. The LSSE survey indicates some student dissatisfaction with advising and technology but those issues are being addressed. The business school uses Noel Levitz and graduation surveys to find and address weaknesses. (CFR 2.10)

GGU's co-curricular programs align with its academic goals, and co-curricular assessment of support units has begun with Student Services, Student Financial Services and the Library. The institution provides appropriate program information and advising. GGU's student support services are very good, and the team was impressed during an onsite tour of the Library. Program reviews indicate that student support services are working well. (CFRs 2.11, 2.12, 2.13)

Subject to the Commission's review, the team's overall finding is that the institution has provided sufficient evidence to demonstrate compliance with Standard 2.

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

#### **Faculty and Staff**

Despite the continued decrease in enrollment, GGU has been able to maintain a highly qualified faculty of 64 individuals and a staff of 194 individuals. The university recognizes the need to maintain a highly qualified faculty. All of the full-time faculty in the Ageno School of Business and the School of Undergraduate Studies currently have doctoral degrees. This is possible through the use of approximately 200 adjunct faculty, who currently teach 80% of the business courses and 56% of the law courses. (CFR 3.1) Adjuncts are expected to possess a degree equal to or greater than the level they are teaching.

The president has made significant changes to the senior leadership team and has created the VP of Enrollment Management position, which is responsible for the new Enrollment Strategy and Services unit. Other key leadership changes to the administration included the departure of the VP of Finance and Administration/CFO (a search is underway), the hire of a new VP of Marketing and Communications, the dean of the new School of Undergraduate

Studies, a new director of IT, and a new head of HR. Changes to the academic administration include the replacement of the law school dean who returned to full-time teaching. (CFR 3.2)

In meetings with faculty the team learned that there was a perceived lack of both a definition and understanding of shared governance between the administration and faculty. The faculty described a top-down hierarchal model of leadership that did not always include their voice in institutional strategies. (CFRs 3.7, 3.10) The team recommends that GGU develop a consensus definition of shared governance and the respective roles and responsibilities of faculty and administration. (CFRs 3.7, 3.10)

The team inquired about the prior lack of meaningful faculty and staff performance reviews as well as the \$1.2M (annualized) pay increases for 82% of the university staff. The pay increases to staff were seen more as an adjustment to the current market and helped GGU to retain people. Some faculty were given an increase in January, which was also perceived as an adjustment to the current market value. The senior leadership believed that this improved morale, but the lack of communication surrounding the increases created animosity among those people who did not receive an increase. The adjustments did not appear to be the result of any performance evaluations, but a response to a market study conducted by human resources. (CFR 3.2) During the onsite visit the team heard repeated references regarding the perceived underperforming Human Resource department. Issues of inconsistent onboarding of employees, irregular routine evaluations of staff, unprofessionalism, and the reporting structure of the department were expressed. (CFR 3.2) The team recommends that GGU improve two-way communication between faculty and administration in areas such as future faculty compensation policies and processes, strategic planning, and creation of new academic programs. (CFRs 3.6, 3.7)

The administration recognizes the importance of supporting faculty development (CFR 3.3), and does offer the financial support for conference attendance when the faculty is presenting, but faculty stated that they have not received this financial support in recent years. A sabbatical has not been granted in over two years, which is consistent with the faculty handbook, due to the current financial constraints. (CFR 3.3)

### **Fiscal Resources**

GGU has had significant declines in net assets since FY14, which has significantly impaired cash flow and quasi-endowment balance. The university is also projecting losses from baseline and strategic operations of \$8.5m in FY19, \$5.3m in FY20 and \$2.7m in FY21. The Quasi Endowment at June 30, 2017 was \$17m down from \$34m in FY11. The losses were used to fund capital expenditures and operations. GGU's main source of revenue is from the net tuition, which is directly impacted by decrease in student enrollment. GGU is currently repaying a long-term debt of \$41m at an interest rate of 2.9%. Due to the losses experienced in FY16 – FY18, the university was in violation of its debt covenants, but was granted a covenant amendment to allow losses those fiscal years. The university recently extended those terms for an additional three years, but was required to use its two rental revenue properties as collateral. (CFR 3.4) This further hampers their ability to access funds from its real estate portfolio.

The declining enrollment has resulted in cumulative net losses from FY15 – FY18 of approximately \$16.3m. Combined with the projected net losses of \$18.2m for FY19 – FY21, GGU appears to be in an unsustainable position without making significant changes. GGU believes that with a continued focus on enrollment and development, the university will be able to bring income back to net positive.

The university did experience positive enrollment growth in the law school, however this was achieved by offering a large amount of presidential scholarships that offset the gains in revenue. The intent was to raise the median LSAT scores of incoming law student enrollees to assist in ABA standards for bar passage. The university expects fall law school enrollment to drop by double digits, but the university believes with a reduction in the overall discount rate, there will be a positive revenue impact.

One of the president's focuses has been on the utilization and development of the alumni base of 70,000 individuals in California, with 28,000 of them residing or working within one square mile of the campus. At the beginning of the fiscal year the university received a large estate gift from a former alumnus. In addition, the university received a \$1 million dollar pledge from another alum.

### **Audits**

From FY11 through FY17, the university engaged an independent auditing firm to perform an audit of its financial statements. The audits have all been unqualified opinions. (CFR 3.4) No management letters were provided.

### **Resource Planning**

Another one of the president's main initiatives has been to update, simplify, and unify current technology. The former software packages were unable to communicate with each other and were outdated. The Development Office is now using a current version of Raisers Edge that allows better communication with alumni. The advisors now use Salesforce for the CRM allowing them better access to the student's history. (CFR 3.5) The overhaul of the system has resulted in an expected saving benefit as GGU is no longer managing multiple subscriptions and was able to renegotiate existing contracts. The savings has allowed IT to purchase new hardware.

Institutional Research has begun building its own data warehouses that will lead to more timely data for the administration.

## **Facilities**

The university was able to consolidate operations and lease two secondary buildings, creating a new revenue stream of \$2m a year. From September 2011 through August 2015 the university invested over \$27m upgrading its primary facility. The campus is located in a highly desirable area of downtown San Francisco that is zoned for the development of a new high-rise building up to 750 feet. The administration and Board of Trustees are currently exploring the possibility of tapping into this economic resource. (CFR 3.5)

## **Organizational Structures and Decision-Making Processes**

GGU's Board of Trustees is comprised of 22 members who oversee the university's policies and operations. The board was responsible for hiring the president in 2015 and is responsible for his evaluation. Within the first two years of being hired, the president has restructured the major administrative units and made changes to the top-level leadership. With these changes to higher level positions the organization also hired mid-level management which included: controller, director of financial planning and analysis, director of marketing, associate dean of law school admissions, director of admissions & recruitment, and a new dean for the school of business who retired. GGU's organizational chart shows a clear lines of responsibility and reporting. (CFRs 3.6, 3.7, 3.8, 3.9, 3.10)

Subject to the Commission's review, the team's overall finding is that the institution has provided sufficient evidence to demonstrate compliance with Standard 3.

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

As an institution, GGU reflects on and analyzes how effectively it accomplishes its mission and achieves its educational effectiveness goals. GGU is highly aware of the changing ecology of its educational niche and has made curricular/programmatic changes to adapt to an evolving educational environment. (CFR 4.7) A recent institution-wide strategic planning effort, entitled “Framing the Future” engaged students, staff, faculty, board members, and alumni in charting a course forward to greater fiscal sustainability in service of the university’s mission. (CFR 4.5, 4.6)

Quality assurance processes are in place for all degree and student support programs, including periodic program review and the assessment of student learning outcomes. (CFR 4.1, 4.4) At the undergraduate level, the WASC core competencies inform the development of student learning outcomes for General Education. For the master’s programs in the Schools of Business, institutional-level outcomes were recently developed. Syllabi of all courses, including online courses, reflect an appropriate number of learning outcomes cast in measurable terms. (CFR 4.1) The Committee for Academic Standards plays an important role in assuring that curricular development and modification are grounded in the assessment of student learning. (CFR 4.4)

GGU has strengthened its institutional research capacity through additional staffing and data tools. (CFR 4.2) The university demonstrates a commitment to making improvements based on data and evidence and to using evidence to support institutional planning processes, for



example in the development of new degree programs and certificates to meet the changing needs of the community it serves. (CFR 4.3)

Subject to the Commission's review, the team's overall finding is that the institution has provided sufficient evidence to demonstrate compliance with Standard 4.

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

The degree programs offered by GGU, along with their flexible modalities, align well with the institution's core mission of serving the educational needs of working adults in the context of the Bay Area's business and legal communities. (CFR 2.1) Stakeholders across the institution share a common understanding of the mission of the university and of the meaning of its degrees, as evidenced by extensive surveys conducted in preparation for the institutional report. In keeping with its focus on practice-based instruction, GGU employs many part-time instructors drawn from local industry. All faculty members are supported in their instruction by the Center for Teaching and Learning Excellence as well as by four full-time instructional designers versed in online pedagogies. (CFR 2.1)

GGU clearly defines what degree holders will acquire from their programs of study. (CFR 1.2) For the undergraduate degrees, General Education program-level learning outcomes include the WSCUC core competencies. At the graduate level, Institutional Learning Outcomes (ILOs) have recently been adopted for all graduate degrees. (CFR 2.3) The recent strategic planning process affirmed the importance of the quality or excellence of the educational experience to the GGU community, defined by the planning group as occurring when "1. Expert faculty delivers relevant and applicable curriculum in an innovative way using pedagogical best

practices, and 2. The student experience outside of the classroom provides significant value to the student” (CFR 4.4).

GGU’s institutional report details the assessment and quality assurance processes that the university uses to ensure the meaning, quality, and integrity of its degree programs as well as the services and units that support the academic programs. The university has in place a systematic program review process for the review of all degree programs (CFRs 2.7, 4.1) as well as a comprehensive learning outcomes assessment program. The assessment process, implemented a decade ago with the hire of a director of assessment and evaluation, consists of, for each degree program, an annual prospective assessment plan; data collection and analysis at the course and program levels; and follow-up reporting on the findings of the analyses. (CFRs 2.3, 2.6, 4.1) The GGU Inventory of Educational Effectiveness Indicators confirms that faculty take collective responsibility for the development and implementation of the student learning assessment process. (CFR 2.4) Given the proportionately small number of full-time faculty, the team wonders if this robust assessment program will be sustainable over time.

GGU develops and defines the standards it uses to measure the meaning, quality, and integrity of its degrees in conjunction with relevant industry organizations and advisory boards. In addition, the university contracts with the Education Advisory Board (EAB) for benchmark information about the curriculum of other institutions offering similar degree programs as well as data on current market skills demands. A different data vendor provides GGU with information on the skills expected by the employer industry or community for each of its master’s degrees. (CFRs 2.1, 4.5, 4.7)

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

In its institutional report GGU described well the methods it uses to assess student learning outcomes and the achievement of core competencies. Notably, the faculty “placed special emphasis on integrating the general education core competencies throughout the curriculum to ensure that graduates possess the necessary skills, knowledge, and habits expected of a degree holder.” Appropriate to GGU's mission focused on adult learners, emphasis was also placed on applied learning, professional success, ethical reasoning and lifelong learning (in addition to the standard critical thinking, written/oral communication and quantitative/information literacy fluency). (CFRs 2.2a, 2.4)

The institution's Degree Qualifications Profile (DQP) report, supported by CAEL and NILOA, led to a detailed review of signature assignments and rubrics used in all undergraduate courses. Degree program alignment of these key academic assessments was part of the review undertaken by faculty. Rubrics and their student scores are shared and analyzed across the Learning Management System. Course syllabi appropriately contain the signature assignments and the programmatic learning outcomes are assessed for each course. Every undergraduate program has a capstone course that requires a major student project assessed against the appropriate PLOs. (CFRs 2.2a, 2.5, 2.6)

Detailed assessment data for each undergraduate program is now produced every trimester thereby enabling deeper dives into individual course and student performances. The loop is closed when these data are used to update PLOs, rubrics and curriculum alignment that enhance student learning in the critical learning areas. The BAM and BSB programs were

recently thoroughly assessed via program reviews and the resulting adjustments to the curriculum and pedagogy are ongoing. (CFRs 2.7, 4.1)

GGU describes and quantifies evidence that show competencies and key learning outcomes are being met, as follows.

- Written communication is assessed by requiring students to construct written communications that articulate and promote ideas, arguments, and solutions. Faculty reviewed student artifacts and determined that student performance is above average;
- Oral communication is assessed by requiring students to give oral presentations and to demonstrate interpersonal communication skills in collaborative projects, through persuasive speech, and in providing clear directions, instructions, and guidelines within a business setting. Results showed that more work is needed. Steps GGU is taking to improve student performance include creation of an ongoing, systematic approach of continuous improvement where discussions of appropriate pedagogy, analysis of signature assignments, and norming of shared rubrics takes place;
- Quantitative reasoning is assessed by requiring students to analyze and interpret quantitative data and apply results to improve business management strategy, tactics, and also requiring students to address a complex business problem applying methods and tools from finance and accounting. Results showed that student performance is above average;
- Critical thinking is assessed by requiring students to address a complex problem in business management using strategies and tactics that lead to the development

of actionable solutions, and also to require that students apply statistical concepts, methods and tools to analyze and interpret data in the formulation of business strategies and tactics. Results showed that student performance is above average;

- Information literacy is assessed by requiring students to locate, evaluate and apply information using a variety of research tools, in analysis of a complex business problem. Results showed that more work is needed. Steps GGU is taking to improve results include development of an information literacy rubric adapted from the AAC&U Information Literacy Value Rubric as part of its systematic approach to continuous improvement described previously.

The institution needs to continuously improve on this good beginning each year until it becomes systemic. (CFRs 2.4, 2.6, 4.3, 4.4)

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

Given its mission and exceptional student diversity, GGU gathers and analyzes data from a wide range of indicators to track student success. The institution appropriately relies heavily on retention and graduation rates to improve their teaching and learning, degree programs, and support services that lead to increased student success. For example, GGU business schools disaggregate retention data into full-time or part-time, online or on-ground, and international or domestic students. Moreover, the institution analyzes professional-oriented success indicators such as licensure, professional exam passage rates, and alumni surveys. (CFR 2.7)

A strong university-wide retention team of faculty and administrators is responsible for analyzing the success data and appropriate follow up. Student Services staff also evaluate retention data to assess and improve their support for students outside of the classroom. GGU

publishes its student success rates -- disaggregated by school and student demographics -- for both its undergraduate and graduate programs on its website. (CFRs 1.2, 1.6, 2.10, 4.1, 4.2)

A large majority of GGU business school graduate students are domestic students who work and typically take about 3 years to graduate (many are part-time or online). On the other hand, their international graduate students are all full-time, enroll solely in on-ground courses, and graduate faster and more often. About 83% of full-time business graduate students graduate within 3 years while only about 66% of part-time students do so. Students take longer to graduate in the graduate tax program because many of them take the spring semester off during tax filing season. On-ground students persist better than online students, prompting an analysis into the reasons why. While the rates are good overall, GGU needs to find more ways to improve them for online and part-time students.

GGU's 3-year graduation rate for graduate business programs is fairly similar across all ethnic categories: Asian - 74%; White - 61%; Black - 67%; Hispanic/Latino - 67%, and Other - 62%. As is typical in higher education, females graduate at higher rates than males. (CFR 2.10)

The GGU undergraduate profile consists of students who typically enroll part-time while working or taking care of a family, or both. Thus, student retention and graduation rates are lower than those of traditional universities and GGU students who do graduate take between 3-8 years.

Given the undergraduate profile, success for these students is defined by GGU as earning a bachelor's degree for (primarily) career advancement or personal edification. This fits nicely with GGU's mission of providing practice-based educational programs in business and related professions while embracing professional ethics and diversity. This definition promotes student success because the university is focused on helping these types of students.

The following table of undergraduate student success, disaggregated by student demographics, was copied from the GGU website. (CFR 2.10)

**AVERAGE STUDENT SUCCESS RATES**

UNDERGRADUATE PROGRAMS				
Bachelor of Arts in Management & Bachelor of Science in Business				
	Graduated within...			Stopped classes after...
	3 Years	5 Years	8 Years	8 Years
<i>academic year(s) started</i>	<i>13-14, 14-15</i>	<i>11-12, 12-13</i>	<i>08-09, 09-10</i>	<i>07-08, 08-09</i>
<b>OVERALL</b>				
	35%	44%	49%	39%
<b>BY RACE</b>				
Asian	38%	56%	50%	--
Black	31%	29%	33%	--
Hispanic	39%	40%	44%	--
White	44%	49%	55%	--
Other	28%	35%	52%	--
Unknown	25%	41%	48%	--
<b>BY GENDER</b>				
Female	36%	46%	54%	--
Male	35%	42%	43%	--

(The graduate table on the website is similarly disaggregated but much taller due to the large number of graduate programs.)

Appropriate to their mission, GGU uses two WSCUC-developed approaches to examine undergraduate student success, namely the Unit Redemption Rate (URR) and the Absolute Graduation Rate (AGR). The institution's URR and AGR have both increased in recent years and are approaching 90%, which indicates that its student success cycle of measuring and analyzing data and then closing the loop is working. Examples include the creation of gateway course for new undergraduate students and enhanced tracking of student progress.

GGU's law school expects full-time students to graduate with the J.D. degree in three

years and part-time students in four years. Bar Pass rates are published on the GGU website. Additional student success rates (disaggregated by ethnicity) for the J.D. are also published on GGU's website in the annual ABA-required Standard 509 Information Report. The law school also offers the LL.M. degree, a post-law degree masters, and the S.J.D. degree, a doctorate of juridical science.

The law school regularly monitors its student retention rates and bar pass rate. The school recently saw a desired increase in its bar pass rate, reversing the trend from prior years. Notably, GGU recently had the fourth best school rate among all ABA-accredited California law schools and had the best rate among the three San Francisco ABA-accredited law schools. The law school achieved these feats by raising minimum grade requirements for each student's first 30 units.

GGU's great student diversity demands that it offer a wide range of student support services. It has expanded, centralized and improved these services over the past five years by using modern communication and "customer relationship" technology, by developing better student-advisor relationships and by making direct referrals for assistance. An early alert system for at-risk students with follow-up tutoring have also helped. (CFRs 2.12, 2.13) Quality Library Services, Veteran Services, a Wellness Resource Center, and an Office of Disability Resources together with the student-connecting mobile app from the Student Life Office help make the many different kinds of students comfortable and successful at GGU. (CFR 2.11)

The institution has strategically identified several ways to increase student success going forward. These include a mandatory orientation, alumni mentors for undergraduates, math placement, preparation and support, and a next generation LMS (the current Moodle LMS



received mixed reviews). These new strategies will round out GGU's strong range of student support services and are designed to increase student success in the coming years.

The team recommends that GGU continue to focus on retention and completion rates using newly implemented methods of collecting and reporting data. (CFR 2.10)

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

Since its last accreditation, GGU has positively grown in the areas of program review, assessment, and use of data and evidence for decision-making. (CFRs 4.1, 4.2) Previous accreditation recommendations have helped strengthen program review and assessment practices, and there is now a stronger infrastructure in place for both academic and co-curricular program review and assessment. GGU seeks 100% compliance for annual assessments, but due to revisions of academic programs and turnover in academic leadership, has not been able to attain this goal. Notably, it was evident that the faculty members were committed to student success and program improvement.

In addition to a new internal assessment website with helpful assessment templates and materials, each academic program develops an annual *Learning Assessment Plan* and direct measures of assessment are used appropriately to ascertain student learning. Results from annual assessment are gathered in each program's *Learning Assessment Report*. Similarly, non-academic units create *Annual Assessment Plans* and *Annual Assessment Reports* to capture student learning outside the classroom.

GGU academic programs, and selected co-curricular units, enter into program review every six years. The exception to this is the J.D. program that undertakes program review every

eight years. The guiding principles for GGU's program review process are sound and represent best practices, including being faculty driven and soliciting external reviewers. Both an Advisory Board and the Committee on Academic Standards (CAS) ensure program review standards are met. There is room in the program review process, however, for CAS to close the loop with program review by circling back with the programs between program review cycles to ensure the changes identified in the program review are being met. There is also room for enhanced feedback and accountability to the programs from the VPAA. Most notably, results from program review are considered for institutional planning and budgeting. GGU should be justifiably proud of the enhanced efforts to collect and disaggregate data to support decision-making, planning, and improvement. (CFRs 4.1, 4.2)

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

As noted throughout this report, GGU has experienced a steady decline in enrollment since FY11. As a result, the university has been operating at net asset loss since FY15 and is projected to continue operating at a loss until FY21. The university has recently made significant changes to their senior management and created a department to focus on enrollment issues. The university has also taken advantage of its property holdings and has diversified revenue streams. In the short term, the university is able to absorb the losses; however, this is not sustainable in the long-term.

The long-term viability of the university hinges on a few key points, including: (1) the university's ability to work with the faculty and the community to determine the correct courses and teaching modalities in order to increase enrollment; (2) working with international recruiting

agents to expand the enrollment pool; (3) the ability to tap into current real estate holdings to continue to diversify revenue streams; (4) the president and the Board of Trustees to realize when a strategy is unachievable and to quickly re-strategize; and (5) the ability of the president and the Board of Trustees to make and act on tough decisions needed to ensure the sustainability of the university.

The landscape of higher education is continually evolving and time is of the essence to ensure the survivability of the university. Without significant changes to the university's current offerings, GGU risks undermining its relevancy in the current higher education landscape. As large well-known universities continue to expand into online courses, the potential student pool will continue to shrink. The president and Board of Trustees are to be commended for recognizing this issue and trying to make the necessary changes to ensure the long-term viability of GGU. (CFR 4.7)

The team recommends that GGU ensure long-term viability through realistic budgeting, strategic enrollment management (including recruitment and retention), diversification of revenue sources, and active fundraising. (CFR 3.4)

### **Component 8: Optional essay on institutional specific themes**

The university did not write an essay on specific themes.

### **Component 9: Reflection and plans for improvement**

In the self-study and during the visit, GGU provided evidence of compliance with WSCUC standards and federal requirements. GGU demonstrated a commitment to delivering a quality education in line with its unique mission, and has assessment of learning outcomes across all programs and delivery modes. Results of assessment are used to inform changes in

curriculum and pedagogy. The institutional report stressed the importance of the strategic plan, new program and certificate development, and systems related to institutional research and learning management system. Despite its financial and enrollment challenges, the team concluded that GGU is educationally effective and can continue on its current path for the near term.

### **SECTION III – FINDINGS, COMMENDATIONS, AND RECOMMENDATIONS**

Educational effectiveness at GGU is sound. The university has policies and processes in place for the assessment of student learning outcomes at the institutional, program, and course levels. Results are used to inform pedagogical and programmatic changes. Online learning, an important component of the institution’s mission, is assessed using methods appropriate to the modality. Periodic review of academic degree programs takes place on a regular basis with results used to inform strategic planning. Appropriate student supports systems are in place and are also assessed to ensure that they support student success.

However, the institution’s finances and long-term viability are of concern. While the university’s operations are not in immediate jeopardy, the institution’s history of deficits as well as projected budget shortfalls are worrisome. Continued focus on fiscal sustainability by the board, administration, and faculty will be critical. In addition, a focus on human resource functions and institutional research operations will be important.

Golden Gate University is commended for:

1. A strong commitment to its mission on the part of students, faculty, staff, administration, alumni, and the board who are all dedicated to diversity and student success.
2. A new leadership team that has focused on strategic thinking and building capacity.

3. Degree programs that are aligned with the institutional mission, and instruction that is appropriately grounded in the business and legal communities.
4. Strengthened student support programs and units through greater centralization and inclusion in the annual quality assurance process.
5. Enhanced collaboration across faculty, disciplines, and schools that has resulted in greater academic synergy.

The team recommends that Golden Gate University:

1. Ensure long-term viability through realistic budgeting, strategic enrollment management (including recruitment and retention), diversification of revenue sources, and active fundraising. (CFR 3.4)
2. Continue to show gains in retention and completion using newly implemented methods of collecting and reporting data. (CFR 2.10)
3. Enhance human resource functions and services, including regular and routine evaluations of staff and onboarding of new staff, full-time and adjunct faculty. (CFR 3.2)
4. Improve two-way communication between faculty and administration in areas such as future faculty compensation policies and processes, strategic planning, and creation of new academic programs. (CFRs 3.6, 3.7)
5. Develop a consensus definition and understanding of shared governance and the respective roles and responsibilities of faculty and administration. (CFRs 3.7, 3.10)
6. Strengthen support for faculty professional development and scholarly activities. (CFR 3.3)

## **APPENDICES**

The report includes the following appendices:

- A. Federal Compliance Forms
  - 1. Credit Hour and Program Length Review
  - 2. Marketing and Recruitment Review
  - 3. Student Complaints Review
  - 4. Transfer Credit Review
- B. Off-Campus Locations Review, as appropriate
- C. Distance Education Review, as appropriate

## **FEDERAL COMPLIANCE FORMS**

### **OVERVIEW**

There are four forms that WSCUC uses to address institutional compliance with some of the federal requirements affecting institutions and accrediting agencies:

- 1 – Credit Hour and Program Length Review Form
- 2 – Marketing and Recruitment Review Form
- 3 – Student Complaints Review Form
- 4 – Transfer Credit Policy Review Form

Teams complete these four forms and add them as appendices to the team report. They are included here in order for the institution to provide the necessary information for the team. Teams are not required to include a narrative about any of these matters in the team report but may include recommendations, as appropriate, in the Findings, Commendations, and Recommendations section of the team report.

### **1 - CREDIT HOUR AND PROGRAM LENGTH REVIEW FORM**

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

#### **Credit Hour - §602.24(f)**

The accrediting agency, as part of its review of an institution for renewal of accreditation, must conduct an effective review and evaluation of the reliability and accuracy of the institution's assignment of credit hours.

- (1) The accrediting agency meets this requirement if-
  - (i) It reviews the institution's-
    - (A) Policies and procedures for determining the credit hours, as defined in 34 CFR 600.2, that the institution awards for courses and programs; and
    - (B) The application of the institution's policies and procedures to its programs and coursework; and
  - (ii) Makes a reasonable determination of whether the institution's assignment of credit hours conforms to commonly accepted practice in higher education.
- (2) In reviewing and evaluating an institution's policies and procedures for determining credit hour assignments, an accrediting agency may use sampling or other methods in the evaluation.

**Credit hour** is defined by the Department of Education as follows:

A credit hour is an amount of work represented in intended learning outcomes and verified by evidence of student achievement that is an institutionally established equivalency that reasonably approximates not less than—

- (1) One hour of classroom or direct faculty instruction and a minimum of two hours of out of class student work each week for approximately fifteen weeks for one semester or trimester hour of credit, or ten to twelve weeks for one quarter hour of credit, or the equivalent amount of work over a different amount of time; or (2) At least an equivalent amount of work as required in paragraph (1) of this definition for other academic activities as established by the institution

including laboratory work, internships, practica, studio work, and other academic work leading to the award of credit hours.

See also WSCUC Senior College and University Commission's Credit Hour Policy.

**Program Length - §602.16(a)(1)(viii)**

Program length may be seen as one of several measures of quality and as a proxy measure for scope of the objectives of degrees or credentials offered. Traditionally offered degree programs are generally approximately 120 semester credit hours for a bachelor's degree, and 30 semester credit hours for a master's degree; there is greater variation at the doctoral level depending on the type of program. For programs offered in non-traditional formats, for which program length is not a relevant and/or reliable quality measure, reviewers should ensure that available information clearly defines desired program outcomes and graduation requirements, that institutions are ensuring that program outcomes are achieved, and that there is a reasonable correlation between the scope of these outcomes and requirements and those typically found in traditionally offered degrees or programs tied to program length.



# 1 - CREDIT HOUR AND PROGRAM LENGTH REVIEW FORM

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

Material Reviewed	Questions/Comments (Enter findings and recommendations in the Comments sections as appropriate.)
Policy on credit hour	Is this policy easily accessible? <span style="float: right;">XX <input type="checkbox"/></span> YES <input type="checkbox"/> NO
	If so, where is the policy located? <a href="http://catalog.ggu.edu/content.php?catoid=3&amp;navoid=103">http://catalog.ggu.edu/content.php?catoid=3&amp;navoid=103</a>
	Comments: GGU has clear definitions of credit hours/units
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)? <span style="float: right;">XX <input type="checkbox"/> YES <input type="checkbox"/></span> NO
	If so, does the institution adhere to this procedure? <span style="float: right;">XX <input type="checkbox"/> YES <input type="checkbox"/></span> NO
	Comments: Committee on Academic Standards reviews proposals for new courses and examines units awarded. Credit hours are also reviewed as part of program review process.
Schedule of on-ground courses showing when they meet	Does this schedule show that on-ground courses meet for the prescribed number of hours? <span style="float: right;">XX <input type="checkbox"/></span> YES <input type="checkbox"/> NO
	Comments: The course schedule lists the end and start dates of the course and the days and time it meets
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 (both three unit courses)
	Type of courses reviewed: <input type="checkbox"/> online XX <input type="checkbox"/> hybrid
	What degree level(s)? <input type="checkbox"/> AA/AS <input type="checkbox"/> BA/BS XX <input type="checkbox"/> MA <input type="checkbox"/> Doctoral
	What discipline(s)? Business
	Are students doing the amount of work per the prescribed hours to warrant the credit awarded? <span style="float: right;">XX <input type="checkbox"/> YES <input type="checkbox"/> NO</span>
	Comments: Syllabi outline expectations for amount of work for the units awarded
Sample syllabi or equivalent for other kinds of courses that do not meet for the prescribed hours (e.g., internships, labs, clinical, independent	How many syllabi were reviewed? 2 (both three units)
	What kinds of courses? Practicum, Internships
	What degree level(s)? <input type="checkbox"/> AA/AS <input type="checkbox"/> BA/BS XX <input type="checkbox"/> MA <input type="checkbox"/> Doctoral
	What discipline(s)? psychology, marketing
	Are students doing the amount of work per the prescribed hours to warrant the credit awarded? <span style="float: right;">XX <input type="checkbox"/> YES <input type="checkbox"/> NO</span>

study, accelerated) <i>Please review at least 1  - 2 from each degree  level.</i>	Comments: Each syllabus specifies the amount of time for the practicum or internship expected of students, along with other academic requirements. Units are appropriate for the amount of work.
Sample program information (catalog, website, or other program materials)	How many programs were reviewed? 2
	What kinds of programs were reviewed? Onsite, hybrid
	What degree level(s)? <input type="checkbox"/> AA/AS <input checked="" type="checkbox"/> BA/BS <input checked="" type="checkbox"/> MA <input type="checkbox"/> Doctoral
	What discipline(s)? psychology, business
	Does this material show that the programs offered at the institution are of an acceptable length? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO

Reviewed by: Christopher Berk  
Date: March 13, 2019

## 2 - MARKETING AND RECRUITMENT REVIEW FORM

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

Material Reviewed	Questions and Comments: (Enter findings and recommendations in the Comments sections of this table as appropriate.)
**Federal Requirements	Does the institution follow federal requirements on recruiting students? XX <input type="checkbox"/> YES <input type="checkbox"/> NO Comments:
Degree completion and cost	Does the institution provide information about the typical length of time to degree? XX <input type="checkbox"/> YES <input type="checkbox"/> NO Does the institution provide information about the overall cost of the degree? XX <input type="checkbox"/> YES <input type="checkbox"/> NO Comments: Each degree program lists the cost per unit and the length of the program: <a href="http://www.ggu.edu/undergraduate/academic-programs/">http://www.ggu.edu/undergraduate/academic-programs/</a> <a href="http://www.ggu.edu/graduate/academic-programs/">http://www.ggu.edu/graduate/academic-programs/</a> In addition, the GGU website provides information on tuition and fees: <a href="http://www.ggu.edu/shared-content/enrollment/tuition-and-fees/tuition/">http://www.ggu.edu/shared-content/enrollment/tuition-and-fees/tuition/</a>
Careers and employment	Does the institution provide information about the kinds of jobs for which its graduates are qualified, as applicable? XX <input type="checkbox"/> YES <input type="checkbox"/> NO Does the institution provide information about the employment of its graduates, as applicable? XX <input type="checkbox"/> YES <input type="checkbox"/> NO Comments: Even though GGU serves working adults, programs describe the kinds of things graduates can do. For example, "graduates from this program can identify and improve employee training, conduct market research." The Law school provides information about the employment of its graduates: Law School: <a href="http://law.ggu.edu/career-development/employment-statistics/">http://law.ggu.edu/career-development/employment-statistics/</a> In addition, GGU surveys its alumni to determine the impact of its degrees.

\*\*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 requirements do not apply to the recruitment of international students residing in foreign countries who are not eligible to receive Federal financial aid.

Reviewed by: Christopher Berk  
 Date: March 13, 2019

### 3 - STUDENT COMPLAINTS REVIEW FORM

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

Material Reviewed	Questions/Comments (Enter findings and recommendations in the Comments sections of this table as appropriate.)
Policy on student complaints	Does the institution have a policy or formal procedure for student complaints? XX <input type="checkbox"/> YES <input type="checkbox"/> NO
	Is the policy or procedure easily accessible? If so, where? <b>General grievance policy:</b> <a href="http://www.ggu.edu/media/about-ggu/documents/policies/general-student-grievance-procedure.pdf">http://www.ggu.edu/media/about-ggu/documents/policies/general-student-grievance-procedure.pdf</a>
	Comments: Procedures for student complaints can be found on the GGU website.
Process(es)/ procedure	Does the institution have a procedure for addressing student complaints? XX <input type="checkbox"/> YES <input type="checkbox"/> NO
	If so, please describe briefly <b>General grievance policy:</b> <a href="http://www.ggu.edu/media/about-ggu/documents/policies/general-student-grievance-procedure.pdf">http://www.ggu.edu/media/about-ggu/documents/policies/general-student-grievance-procedure.pdf</a>
	If so, does the institution adhere to this procedure? XX <input type="checkbox"/> YES <input type="checkbox"/> NO Comments: GGU outlines the steps students can take to resolve complaints or file grievances.
Records	Does the institution maintain records of student complaints? XX <input type="checkbox"/> YES <input type="checkbox"/> NO
	If so, where? Files are maintained in the office of the VP for Academic Affairs
	Does the institution have an effective way of tracking and monitoring student complaints over time? XX <input type="checkbox"/> YES <input type="checkbox"/> NO If so, please describe briefly:
	Comments: Institution receives only a couple of complaints per year, mostly related to academic issues.

**4 – TRANSFER CREDIT REVIEW FORM**

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

<b>Material Reviewed</b>	<b>Questions/Comments (Enter findings and recommendations in the Comments sections of this table as appropriate.)</b>
Transfer Credit Policy(s)	Does the institution have a policy or formal procedure for reviewing and receiving transfer credit? <span style="float: right;">XX <input type="checkbox"/> YES <input type="checkbox"/> NO</span>
	If so, is the policy publicly available? <span style="float: right;">XX <input type="checkbox"/> YES <input type="checkbox"/> NO</span>
	If so, where? UG Transfer Credit: <a href="http://catalog.ggu.edu/content.php?catoid=3&amp;navoid=100#undergraduate-transfer-credit">http://catalog.ggu.edu/content.php?catoid=3&amp;navoid=100#undergraduate-transfer-credit</a>  GR Transfer Credit: <a href="http://catalog.ggu.edu/content.php?catoid=3&amp;navoid=100#graduate-transfer-credit">http://catalog.ggu.edu/content.php?catoid=3&amp;navoid=100#graduate-transfer-credit</a>
	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? <span style="float: right;">XX <input type="checkbox"/> YES <input type="checkbox"/> NO</span>
	Comments: GGU describes the number of units accepted for transfer, criteria for transferring units, as well as other sources of transcript credit (e.g., CLEP)

\*§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 WSCUC Senior College and University Commission’s Transfer of Credit Policy.

Reviewed by: Shawna Lafreniere  
Date: March 13, 2019

## **B. Off Campus Locations Review**

Institution: Golden Gate University  
Type of Visit: Reaffirmation Visit  
Name of reviewer/s: Jonathan L. Reed  
Date/s of review: February 23, 2019

### 1. Site Name and Address

*Location Type: Additional  
3000 Mission College Blvd.  
Santa Clara, CA 95054  
OPEID: 120504*

### 2. Background Information

Golden Gate University established a cohort model for a Masters in Human Resource Management in 1979 on site of Mission College's campus in Santa Clarita. They rent modern, high quality classroom space in the main administrative building. In the past, the campus has also offered an executive MBA at this location. The current cohort (of 15 students) takes two hybrid classes during a Saturday every other week. There are no full-time faculty members at the site; both classes were taught by adjuncts, one long-time and an alumnus, the other a more recent hire. A Cohort Coordinator takes care of advising and liaison for all student services with the main campus.

### 3. Nature of the Review

During the half-day review meetings were held with the Program Director (Marianne Koch), Cohort Coordinator (Mark Kennedy), Dean (Gordon Swartz), as well as two instructors (Richard Berry and Aisha Leach). A half hour session with the students was also held in the classroom. Syllabi, data on retention and graduation rates, and adjunct faculty support were reviewed.

<b>Lines of Inquiry</b>	<b>Observations and Findings</b>	<b>Follow-up Required (identify the issues)</b>
<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	None
<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)	The site is consistent with GGU's mission, in alignment with their administrative structure, and operationalized.	None
<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 adjunct faculty also teach at the main campus, the cohort coordinator visits each session, and students shared an affinity for the institution.	None
<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)	Learning takes place in modern, well-kept classrooms on a community college campus.	None
<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)	The cohort coordinator visits the students each session, and ensures that advising occurs and other support takes place. Students were enthusiastic about their support, especially financial aid and the library.	None

<p><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)</p>	<p>The program director oversees the adjunct faculty, conducts an initial training, reviews the syllabi and assignments, and subsequently visits classes with a mid-term and final review (including student feedback). There is opportunity for curricular development.</p>	<p>None</p>
<p><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)</p>	<p>The curriculum is designed by the faculty and program director, approved by the faculty, and is the same as the fully online and main campus.</p>	<p>None</p>
<p><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)</p>	<p>The data reveals an impressive 100% graduation rate for almost all cohorts over the past 5 years. Rates are better than the main campus'.</p>	<p>None</p>
<p><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)</p>	<p>Student learning is assessed in the same manner as the main campus, and as part of program review. The results from the cohorts are at or above the main campus.</p>	<p>None</p>



<p><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)</p>	<p>The high graduation rates and subsequent career success is the strongest indication of the site's effectiveness and quality.</p>	<p>None</p>
---	---	-------------

### **C. Distance Education Review**

Institution: Golden Gate University  
Type of Visit: Reaffirmation of Accreditation  
Name of reviewer/s: Cecile Lindsay  
Date/s of review: March 1-13, 2019

1. Programs reviewed: BS in Business MA in Industrial/Organizational Psychology; Executive MPA.

Courses reviewed: ACCT 1A, Introductory Financial Accounting; ENG 120, Business Writing; MGT 307, International HRM; MGT 324/PSY 341 Organizational Behavior and Process; EMPA 306 Public Service and the Law; SOC 50 American Government in the 21<sup>st</sup> Century.

2. Background Information:

All of GGU's degree programs except for the DBA and those in the Law School are offered fully online, fully face-to-face, or hybrid at the student's discretion, for a total of 19 online programs. Online programs are at the associate, bachelors, and master's level. The first GGU program to be offered fully online was the MS in Taxation, which began in 1999. Online courses primarily are offered asynchronously using GGU's LMS (Moodle). Some office hours, tutoring, and instructor-led review sessions make use of Zoom web conferencing software for synchronous learning. Online enrollments have increased steadily in undergraduate programs since 2008. Online units in master's programs have remained steady since 2013, while face-to-face units in those programs have declined. Currently, 39% of business students take all their units online, 23% entirely in person, and 38% take some courses in both formats. These numbers show that online learning is a significant part of operations for GGU.

3. Nature of the review:

Examined GGU website; Sample of online courses in each program reviewed; report on “Online Learning at Golden Gate University” prepared by Doug Geier, Director of eLearning. Interviewed students, administrators, and staff, including VPAA Barbara Karlin, Business School Deans and Chairs/Program Directors, and the Committee on Academic Standards.

**Observations and Findings**

<b>Lines of Inquiry (refer to relevant CFRs to assure comprehensive consideration)</b>	<b>Observations and Findings</b>	<b>Follow-up Required (identify the issues)</b>
<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?	Institution sees distance learning as central to its mission of educating the adult learner. Distance offerings are planned, funded, and operationalized in the same manner as all curricular offerings in the Business Schools since all are offered in all modalities.	
<i>Connection to the Institution.</i> How are distance education students integrated into the life and culture of the institution?	All courses use threaded discussion and group projects to provide interaction with classmates and instructors. Zoom web conferencing provides opportunities to connect “virtually.” Services and outreach to all students are provided by the Student Life Office.	
<i>Quality of the DE Infrastructure.</i> Are the learning platform and academic infrastructure of the site conducive to learning and interaction between faculty and students and among students? Is	The institution’s infrastructure for distance learning is robust. Applications in use at GGU such as Turnitin, Kaltura, and ProctorU are widely used. Security measures are in place and regular backups	

<p>the technology adequately supported? Are there back-ups?</p>	<p>are hosted on Amazon Web Services. The LMS is hosted by a 3<sup>rd</sup> party vendor, Remote Learner. GGU is exploring options for a new LMS to provide additional support features.</p>	
<p><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?</p>	<p>Access to tutoring is available via Zoom web conference. 24/7 technical helpdesk. The eLearning website includes a student orientation, tips, and tutorials as well as links to library resources. Embedded in the courses are links for technical help and student support services and units.</p>	
<p><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?</p>	<p>Online courses are taught by both full- and part-time instructors. Most faculty teach both in person and online. Instructional designers assist faculty in creating online courses. The Center for Teaching and Learning Excellence provides assistance with pedagogy. An online orientation is required of all new instructors in the business schools. Data are monitored to ensure quality, and courses that need improvement are targeted for additional support. Faculty are responsible for course development and for assessing student learning at the course and program level.</p>	
<p><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.)</p>	<p>Online courses are developed, approved, and evaluated in the same way as face-to-face courses.</p>	

<p><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?</p>	<p>Institutional data shows that first term students taking only online courses stopped out at higher rates. To address this disparity, GGU has implemented new tools and programs for online-only learners.</p>	
<p><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?</p>	<p>Assessment of student learning in online courses is comparable to assessment in face-to-face courses. Since most GGU students mix the two modalities, the institution does not compare learning outcomes by modality.</p>	
<p><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>Contracts with Unaccredited Organizations</i>?</p>	<p>There are no contracts with outside vendors to develop or teach courses. Courses are built by faculty with the assistance of instructional design staff and are delivered using Moodle, which is hosted by Remote Learner. GGU has a contract with Inside Track to provide success coaching services to undergraduates. GGU is in compliance with the policy on <i>Contracts with Unaccredited Organizations</i>.</p>	
<p><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?</p>	<p>Online courses are monitored by GGU eLearning for quality indicators such as faculty engagement, with weekly reports going to deans and department chairs. Periodic reviews are conducted by eLearning staff to identify courses that need improvement, with follow-up as</p>	

	necessary to address the issues identified. With most students learning both in person and online, and with learning outcomes and graduation rates similar to those of comparable institutions, it appears that the distance courses are educationally effective.	
--	---	--