

REPORT OF THE WSCUC TEAM  
SPECIAL VISIT

To Golden Gate University

April 6–9, 2021

Team Roster

Dr. Jonathan Reed, Chair, Provost and Vice President for Academic Affairs, University of La Verne

Dr. Rebecca C. Hong, Assistant Chair, Assistant Vice Provost of Educational Effectiveness  
and Assessment, Loyola Marymount University

Ms. Jen Keyes, Chief Financial Officer, National University

Mr. Steven Weiner, President, Menlo College

Dr. Barbara Gross Davis, WSCUC 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 ..... 2**

- A. DESCRIPTION OF INSTITUTION, ACCREDITATION HISTORY, AS RELEVANT, AND VISIT .....2
- B. DESCRIPTION OF TEAM’S REVIEW PROCESS.....5
- C. INSTITUTION’S SPECIAL REPORT: QUALITY AND RIGOR OF THE REPORT AND SUPPORTING EVIDENCE .....7

**SECTION II – EVALUATION OF ISSUES UNDER THE STANDARDS ..... 8**

- A. FINANCES .....8
- B. ENROLLMENT .....12
- C. RETENTION AND COMPLETION .....17

**SECTION III – OTHER TOPICS, AS APPROPRIATE .....24**

**SECTION IV – FINDINGS, COMMENDATIONS, AND RECOMMENDATIONS .....27**

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

### **A. Description of Institution, Accreditation History, as relevant, and Visit**

#### *Background*

Golden Gate University (GGU) is a private, nonprofit university with a history dating back to 1881 as a “night school” located in the San Francisco YMCA. In 1901, GGU offered the first evening law school program in California followed by the first four-year accounting program on the west coast. In 1910, GGU relocated to San Francisco’s financial district and was incorporated in 1923 as Golden Gate College. GGU received initial WASC accreditation in 1959 as a specialized institution in business, law, and related curricula.

GGU’s mission seeks “to prepare individuals to lead and serve by providing high quality, practice-based educational programs in law, taxation, business, and related professions as a nonprofit institution in an innovative and challenging learning environment that embraces professional ethics and diversity.” As of fall 2020, GGU enrolled 595 undergraduate students in the School of Undergraduate Studies, 1,361 graduate business students in the Schools of Business, Tax, and Accounting, and 556 law students in the American Bar Association (ABA) accredited School of Law. GGU currently offers undergraduate, graduate, and doctoral degrees, including an associate’s degree and 20 undergraduate certificate programs. Courses are offered in online, hybrid, and on-site modalities throughout the year in three 15-week terms for most programs, except for the law programs where students typically only enroll full-time in the fall and spring term. (CFR 1.5)

GGU is governed by an 18-member board of trustees that sees its primary role as ensuring fiscal sustainability, oversight of the president, as well as approving and monitoring the strategic plans of the institution. The institutional report also stated that the board “oversees policies and operations.” According to the institution’s organizational chart submitted in January 2021, the president’s team consists of an interim dean of the School of Law, dean of the Schools of Business, Tax, and Accounting,

dean of the School of Undergraduate Studies, chief operating officer (COO) who has also taken on the role of chief financial officer (CFO), interim director of development, and the interim team lead for strategic communications and marketing.

### *Accreditation History*

Golden Gate University's last reaffirmation of accreditation review was in March 2019 followed by the WSCUC Commission Action Letter (CAL) issued in July 2019 reaffirming accreditation for another six years with a Special Visit (SV) in spring 2021. The Commission asked GGU to specifically address three areas in the 2021 Special Visit: 1) finances, 2) enrollment, and 3) retention and completion. This SV team report is based on the virtual visit with GGU that was held from April 6-9, 2021, with three areas of focus identified during the last reaffirmation of accreditation review in 2019 highlighted in the WSCUC Commission Action Letter (CAL).

1. Finances
  - a. Budget projections
  - b. Revenue by source
  - c. Fundraising detail
  - d. An assessment of the financial status of the institution
2. Enrollment
  - a. Five-year trend analysis for GGU overall
  - b. Discrepancies, if any, between enrollment goals and actual enrollments
3. Retention and Completion
  - a. Institutional Research reports related to retention and completion by degree program

These three areas of focus stemmed from the recommendations cited in the 2019 CAL:

- Ensure long-term viability through realistic budgeting, strategic enrollment management (including recruitment and retention), diversification of revenue sources, and active fundraising. (CFR 3.4)
- Demonstrate gains in retention and completion using newly implemented methods of collecting and reporting data. (CFR 2.10)

### *Major Changes Since Last WSCUC Visit in 2019*

Since GGU's last visit in March 2019, several WSCUC Substantive Change proposals have been approved and new academic programs, certificates, or delivery modes have been added:

New degrees since the visit (both online and in-person):

- Bachelor of Arts in Organizational Leadership and Human Skills Development
- Bachelor of Arts in Psychology
- Bachelor of Science in Data Analytics
- Bachelor of Science in Accounting
- Master of Science in Leadership
- MS Financial Analytics

New certificates since the visit (both online and in-person):

- Accounting Data and Analytics Graduate Certificate
- Accounting Foundations Graduate Certificate
- Advanced Analytics for Accountants Graduate Certificate
- CPA Applied Accounting Graduate Certificate
- Facebook Digital Marketing certificate
- GR Certificate in Adaptive Leadership
- GR Certificate in Project Management Fundamentals
- GR Certificate in Project Management Practices
- GR Certificate in Urban Innovations
- Project Management Undergraduate Certificate
- Salesforce for Business CRM Essentials certificate
- UG Certificate Building and Sustaining Relationships for Organizational
- UG Certificate in Basic Proficiency in Data Visualization with Tableau
- UG Certificate in Basic Proficiency in Programming with R
- UG Certificate in Basic Proficiency in Programming with Python
- UG Certificate in Basic Proficiency in Programming with SAS
- UG Certificate in Basic Proficiency in Programming with SQL
- UG Certificate in Data Analytics
- UG Certificate in Leading and Managing through Change and Disruption

Added online delivery to degrees previously only offered in-person:

- LLM in Taxation (approved for in-person in 1978)
- MA in Counseling Psychology (approved for in-person in 1999)

Several changes in GGU's senior leadership have taken place since the last review, leaving vacancies in the key positions of vice president of academic affairs and dean of student services. In addition, several senior leadership positions were held by interims at the time of the visit. Further, a letter dated April 9, 2020, detailed a vote of no confidence in the president and chief operating officer from the majority of faculty in the Ageno School of Business, the Schools of Tax and Accounting, and the

School of Undergraduate Studies that was presented to the board of trustees. After completing a thorough investigation, the board's response on April 17, 2020 articulated support for both the president and the COO. In addition, in response to continued enrollment challenges, the board mandated a \$10M reduction in expenses that led to layoffs, unfilled positions, and cuts in operating expenses.

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

The Special Visit team received GGU's self-study report and supporting materials in late January 2021. After reviewing the report, materials, and the 2019 accreditation visit team's report and CAL, each team member submitted their independent assessment of each section of the institution's self-study report, focusing on the three areas identified in the CAL. The assistant chair compiled each member's initial responses on the team worksheet in preparation for the team's two-hour conference call on February 23, 2021. During the call, the team discussed areas of focus for the special visit based on the team worksheet, compiled a list of additional documents to request from the institution, proposed an initial visit schedule, and agreed to writing assignments for the SV team report. The team held another two-hour conference call on March 11, 2021, to finalize the visit schedule and draft questions for each meeting, and to discuss the additional documents furnished by the institution per the team's request.

In addition to the SV report and materials furnished by GGU, the team reviewed anonymous correspondence sent to WSCUC raising concerns about shared governance at the institution, communication patterns between administration, board, and faculty, as well as low staff and faculty morale. This material was reviewed before the SV, along with additional information the team received through the WSCUC confidential email account. While the team's focus continued to be on the three issues cited in the CAL for the special visit, given the magnitude of concerns with these other issues that arose also during the SV, this report adds these concerns in section III.

Each team member served as the first author for one section of the report and second author for other sections and compiled a preliminary rough draft of the report before the visit. The team continued to refine the report throughout the visit based on interviews and findings. The full report draft was reviewed by the entire team and underwent multiple edits before the final version.

On March 29, 2021, the team chair held a call with the president as part of the WSCUC review process. The team chair reiterated that the focus of the special visit would be on the three issues outlined in the CAL, and noted that the team was also made aware of the vote of no-confidence and board response. The president provided a several important updates to the team chair. This included the hiring of a new dean for the law school starting June 1, 2021, the budget being on track due to cuts and higher-than expected enrollments, an increase in applications for the Juris Doctorate (JD) part time JDFLEX program, and a lower than expected recent bar pass rate.

Due to COVID-19 travel restrictions, the site visit was held remotely from April 6–9, 2021, beginning with a team meeting with the president on the first day. In this meeting, the president shared with the team that he had just announced that afternoon a search for a new chief academic officer who will oversee all schools at GGU. Since the retirement of the former vice president of academic affairs (VPAA) in 2020, the role and responsibilities of the Chief Academic Officer had been held by the president, with some responsibilities distributed to two deans.

Throughout the visit, the team took an inquiry approach to each meeting with the goal of gathering evidence and support for the institution's response to the three areas outlined in the CAL. The team requested and reviewed additional documents throughout the visit and regularly monitored the confidential email account.

While not the central focus of this SV, the team heard there had been little progress in several of the recommendations from the last visit. In particular, issues centered around the Commission recommendations to “improve two-way communication between faculty and administration” and

“develop a consensus definition and understanding of shared governance and the respective roles and responsibilities of faculty and administration” appeared to be trending in the opposite direction according to almost all faculty interviewed and as articulated by confidential emails. The team’s observations in this area are described under section III of this report.

### **C. Institution’s Special Report: Quality and Rigor of the Report and Supporting Evidence**

The team concluded that GGU’s institutional report was organized and appropriately focused on the three main areas outlined in the 2019 CAL: finances, enrollment, and retention, and graduation. The report addressed each of the three areas and discussed the progress made since 2019. The team found the report demonstrated an awareness of the issues impacting each area, the challenges that lie ahead, and significant and far-ranging efforts to strengthen the institution.

According to the GGU report, data and program information were supplied by various academic and operation units and the president, president’s executive assistant, ALO, COO/CFO, and dean of the School of Undergraduate Studies worked together on sections of the report.

While the team found that the self-study report addressed what the institution had been doing in each of the three areas, the report at times stopped short in analyzing how GGU’s efforts were intended to propel the institution beyond 2021. For example, the team was unable to determine how the institution’s financial future is tied to a strategic enrollment and retention plan. While a branding exercise was underway, it was unclear how other new initiatives are expected to result in increased enrollment numbers and revenue. The team was unable to confidently conclude that GGU coherently connected what it wishes to achieve in the next few years with its current realities. As a result, the institution’s conclusions written in the institutional report appeared broad and general, and lacked a clear roadmap for institution as well as metrics for assessing success.



## **SECTION II – EVALUATION OF ISSUES UNDER THE STANDARDS**

### **A. Finances**

The 2019 accreditation team report recommended that GGU “ensure long-term viability through realistic budgeting, strategic enrollment management (including recruitment and retention), diversification of revenue sources, and active fundraising.” GGU provided the key financial documents in its institutional report, and followed up with additional information that was requested during the visit.

The institution’s FY 2018 strategic plan (Framing Our Future) focused on revenue growth through critical enrollment initiatives in undergraduate, graduate business, and the law school, while leveraging property holdings to diversify revenue streams. After the first term of FY 2020, while GGU began experiencing positive trends in enrollment from the initiatives, it was evident to the board and administration that the institution would have to implement significant cost-cutting measures to ensure financial sustainability. Declines in international students and in the tax and accounting programs offset the growth in law, graduate business (Ageo), and undergraduate studies.

GGU had incurred financial losses of \$1.4M, \$7.5M, and \$2.2M in the Fiscal Years 2018, 2019, and 2020, respectively. The university provided a forecast for FY 2021 reflecting a \$2.2M surplus. During the visit, the team received an updated FY 2021 forecast decreasing the surplus to \$0.6M. The change resulted from a \$2M increase in expenses offset by a \$1.0M increase in revenue from tuition, government grants, and contracts revenue. The increase in forecasted tuition revenue was primarily due to enrollment growth in new veteran students, overall increased enrollment in the JD program, including the new JD Flex program, and a higher base of continuing students due to undergraduate and graduate business enrollment growth in recent terms. GGU has focused on the veteran student population for several years, and in FY 2021 received a \$2M grant to establish the Helen Diller Center for Veterans. Additionally, the institution created and implemented a JD Flex program in the school of law to increase enrollment. During the site visit, the team learned that

the projected growth in revenue for FY 2022-2024 is based in large part on continued growth in veteran and JD Flex enrollment.

### *Cost reductions*

The institutional report articulated a significant expense reduction initiative launched at the start of FY 2020 that included a flattening of the organizational structure. According to board members, to avoid significant cuts in faculty lines, the roles and responsibilities of administrative leaders were consolidated and reorganized. From the time of the previous reaccreditation visit in 2019 to the current SV, GGU's senior leadership team went from eleven senior leadership positions to six, as illustrated in the report's organizational chart. The reorganization resulted in the consolidation of the chief operating officer (COO) and the chief financial officer (CFO) roles, and with the departure of the dean of the Ageno School of Business, the consolidation of four dean roles into three. The VPAA stepped down in May 2020, and the position remains vacant, with responsibilities assumed by the COO and president, who then began meeting directly with the academic deans. At the time of the SV, the senior leadership team included three interim positions: the law school dean (new appointment will begin on June 1, 2021), the director of development and alumni relations, and the marketing lead (with plans to combine the latter two into a single vice president position for which there is currently an active search). The senior leadership team does not include the director of human resources or the director of enrollment (both positions are currently filled with interim directors), as these areas report to the COO/CFO. (CFRs 3.1, 3.7)

In response to ongoing financial challenges exacerbated by the pandemic, a total of 27 positions were eliminated in 2020 (roughly 10% of GGU's workforce). This reduction resulted in a decrease in full-time salary expense from \$21.4M in FY 2018, \$23.3M in FY 2019 and \$23.4M in FY 2020, to \$20.2M forecasted for FY 2021 and \$19.8M for FY 2022-2024. The FY 2022-2024 forecasted full-time compensation include salaries for the three interim positions as well as a new chief academic officer.

The team noted that the salaries included in the financial reports represent full-time personnel only. All other staff, such as part-time, adjunct professors, and contracted personnel are included in other operational expenses. Based on GGU's FY 2021 forecast, full-time salaries alone make up approximately 41% of the university's total expenses. The team suggests that, moving forward, internal financial reporting include total salaries with part-time and adjunct professors, to provide fuller visibility of the impact of cost-cutting measures and restructuring efforts. (CFRs 3.4, 3.7)

At the start of 2020, GGU engaged Deloitte on a project called "Levers of Change," with the goal of identifying expenditure cuts between \$10M - \$14M over three years. With the impact of COVID-19, that goal was changed to accelerate cuts to \$10M in FY 2021 alone. At the time of the SV, the original FY 2021 financial forecast reflected a decrease in expenses from \$56M in FY 2019 to \$47M in FY 2021. Subsequently, GGU recognized that the \$10M in expense reduction could undermine the very initiatives needed to increase enrollment, including marketing. In addition, external federal (CARES Act) and foundation (Diller) funding brought expenditure requirements. As a result, GGU revised the FY 2021 forecast to increase expenses by \$2M and is currently projecting an operating surplus of \$0.6M for FY2021. GGU experienced significant deficits in the prior three years (FY 2018–2020).

The institutional report described a significant streamlining of the graduate business school's curriculum, led by a joint faculty-administration task force that was monitored by the board of trustees. The restructure suspended two degrees: a masters in marketing and a doctorate in business administration. In addition, a concentration in supply chain management was suspended. The restructure resulted in higher average class sizes, which increased from 9.97 students in fall 2019 to 15.33 students in fall 2020, resulting in significant cost efficiencies.

The team commends GGU for implementing a broad cost efficiency approach. The team recommends that the institution monitor the impact on faculty and staff workloads as well as student learning experiences to ensure that the recent changes do not negatively impact the institution's

educational objectives, interfere with the capability to establish and oversee academic policies, or hinder the integrity and continuity of its academic and co-curricular programs. (CFRs 3.1, 3.6, 3.7)

*Diversification of revenue*

The institutional report included updates on fundraising, indicating an intention to increase contributions through growth in giving by alumni and other donors. The institution experienced a significant rise in contributions during the last three fiscal years, totaling \$12.7M in gifts received compared to \$5.7M in the previous period three-year period. The report stated that the university intends to invest in additional fundraising staff when enrollment and revenue trends increase and stabilize. GGU revenue projections for fundraising in FY 2023 and FY 2024 are flat at \$2.9M.

During the visit, the team learned that GGU also conducted a space study to determine its needs for onsite programs and ensure maximum rental income potential. GGU built into this study various scenarios given the market reaction during the COVID-19 pandemic and the potential for increased remote work in the future. The financial projections reflect this by maintaining current rental income for FY 2021 and FY 2022 (\$0.63M) and increases in FY 2023-2024 (\$3.3M).

*Summary of financial performance and projections*

				2021	2021	2022	2023	2024
Financial summary (millions)	2018	2019	2020	(forecast)	(forecast) REVISED	(forecast)	(forecast)	(forecast)
Total change in net assets	(1.4)	(7.5)	(2.2)	2.2	0.6	(3.5)	0.5	2.9

As previously stated, the team commends GGU and the board on their responsiveness to ensure financial sustainability through significant expense-cutting and efficiency measures, as well as new program development. Given the significance of the changes made through cost-cutting, the team recommends that the institution evaluate the new leadership structure to ensure faculty and staff are sufficient in number, professional qualification, and diversity. In addition, the team suggests that the institution ensure that its organizational structures and decision-making processes are clear and consistent with its purposes, support effective decision making, and keep an eye on sustaining

institutional capacity and educational effectiveness. The evaluation should include future strategic initiatives and needed faculty and staffing levels to achieve institutional goals. (CFRs 3.1, 3.7)

Given the changing higher education environment resulting from the pandemic, alongside increased competition in the online market for working adults, the team also recommends GGU assess the student experience at GGU to determine if the cost-saving measures are creating any unintended negative impact and to ensure that resources are aligned with educational purposes and objectives. In addition, the team suggests that GGU develop a plan for evaluating strategic initiatives in brand management and identity, and establish a more strategic program portfolio management process that assesses the financial impact of current and new programs to determine how best to allocate programmatic investments. More generally, GGU should develop capacity for analyzing program-specific revenue and costs. The team recommends that GGU continue to develop resource planning and program development with realistic budgeting, enrollment management, and diversification of revenue sources to ensure long-term viability. (CFR 3.4)

## **B. Enrollment**

The 2019 accreditation team report recommended that GGU ensure long-term viability in part through strategic enrollment management (including recruitment and retention). The GGU institutional report states that the institution implemented a strategic plan that focused on growth strategies in undergraduate enrollment, repositioning the graduate business programs in the Ageno School of Business to respond to market demand, and launching a hybrid JD Flex program in the law school. (CFR 3.4)

### *Undergraduate enrollment*

GGU launched four new undergraduate degrees in fall 2019 and lowered tuition by 30% from \$660 to \$462 per unit. New student enrollment in undergraduate programs increased 43% in fall 2019

from fall 2018, and increased 10% from fall 2019 to fall 2020. Total enrollment in undergraduate programs increased 24% from fall 2018 to fall 2019, and 19% from fall 2019 to fall 2020. It is unclear from the institutional report if GGU presumes the enrollment growth in undergraduate studies was driven by the decrease in tuition, new degree offerings, both, or other factors. Currently, GGU serves approximately 595 undergraduate students.

#### *Ageno School of Business*

Enrollment in the Ageno School of Business grew by 7% in the last two years (883 in fall 2020 compared to 825 students in fall 2018). Overall enrollment increased by 8% from spring 2020 to spring 2021. New domestic student enrollment increased by 8.6% between FY 2018 and FY 2020. Prior to fall 2020, new domestic student enrollment was flat between fall 2018 and fall 2019, but experienced a 24.1% increase from fall 2019 and fall 2020. The increased enrollment in domestic students was offset by a 17% decline in international students between fall 2018 and fall 2019. International student enrollment declined by 31% between fall 2019 and 2020. GGU is aware of the impact of the declining international student population on total enrollment and is expecting international enrollment to grow again when restrictions due to the pandemic are lifted. GGU has retained its international team to provide support for existing international students and prepare for the pipeline of students waiting for released restrictions.

The business school also experienced increases in military student enrollment, which grew 16% between fall 2018 and fall 2019, and 34% between fall 2019 and fall 2020. The report did not indicate whether specific initiatives were implemented targeting the military population. However, the team learned during the site visit that the military, specifically veterans, is expected to continue to be a significant part of GGU's student body. The grant-funded Helen Diller Center for Veterans is expected to enhance military recruitment and retention. Growth of veteran enrollment is projected to continue throughout FY 2022-2024.

Prior to the implementation of the 2018 Framing Our Future strategic plan, GGU experienced stable enrollment in the business school, which the institution attributed to the establishment of a new Master of Business Analytics degree program and targeted marketing and enrollment operations. Since the implementation of the 2018 strategic plan, GGU launched a master's degree in leadership with a new "core plus specialization" curriculum to increase enrollment. The institution also developed stackable/modular certificates which, per the institutional report, contributed to increases in student enrollment, albeit to a lesser extent than the new master's degree program in leadership. The report did not stipulate evaluation methods used to assess the impact of each of the initiatives on enrollment, a point confirmed during the visit.

GGU currently uses enrollment targets for projections, and is building a strategic enrollment management plan. The team recommends including an assessment of the impact of each individual initiative in the enrollment management plan to allow a quick response to enrollment results.

#### *School of Law*

The institutional report focused on the Juris Doctorate (JD) program enrollment in the law school. To understand the overall enrollment of the law school, the team examined enrollment data supplied by GGU and found overall enrollment increased by 9% (561 to 611) between FY 2018 and FY 2020 (16% increase between FY 2018 and 2019, offset by a 6% decline between FY 2019 and FY 2020). New student enrollment declined by 32% (246 to 167) between FY 2018 and FY 2020. While new student enrollment increased 14% between FY 2018 and FY2019, it was offset by a 41% decline between FY 2019 and FY 2020. Per the "By Term & Acad Yr, Student Status" report provided by GGU, domestic student enrollment increased 9% (476 to 518) between FY 2018 and FY 2020 (18% increase between FY 2018 and 2019, and declined by 8% between FY 2019 and FY 2020). International student enrollment increased 22% (64 to 78) between FY 2018 and FY 2020 (14% increase between FY 2018 and FY 2019, and increased by 7% between FY 2019 and FY 2020), while military student enrollment decreased 7%

(27 to 25) between FY 2018 and FY 2020 (19% increase between FY 2018 and FY 2019, and 22% decrease between FY 2019 and FY 2020). The team noted inconsistencies in enrollment figures in the different GGU enrollment reports, and recommends the strategic enrollment management plan include clarification on terminology and final enrollment numbers in order to support planning and decision making. (CFR 3.4)

The institutional report stated the enrollment trend was impacted by a shift in academic profile and a new scholarship program for admitted students, in response to disappointing first-time bar pass rates in 2015 and 2016. The report described tuition trends in the JD program in light of declining enrollment (531 in FY 2018, to 484 in FY 2020) and noted an overall increase in net tuition revenue (\$11.3M in FY 2018, to \$13.1M in FY 2020). GGU's tuition strategy to lower the discount rate, once it had accomplished its objective of increasing the student profile, resulted in a higher net tuition review.

GGU's goal is to retain the current size of incoming classes to the full-time, day JD program, to increase enrollment in the part-time JD classes through the JDFlex program, to grow tuition revenue through lower tuition discount rates and scholarships, and to continue to improve the reputation of the law school through enhancing the academic credentials of incoming classes. The institution plans on developing an outreach plan comprised of in-person recruitment fairs, specialized events, targeted e-mail and social media campaigns, webinars and individualized counseling sessions. GGU is also expanding its program, in addition to continued use of the Law School Admission Council (LSAC) candidate referral service.

GGU provided projected enrollments at the law school for fall 2021 through fall 2023, which shows overall enrollment at 553, 574, and 606 for FY 2022, FY 2023 and FY 2024, respectively. Fiscal year 2020 ending enrollment for the law school was 621.



### *Tax and Accounting*

Overall enrollment in the tax and accounting schools declined by 29% in FY 2018, and 52% in FY 2020. Military enrollment increased 13% in the tax program, and remained flat in the accounting program between FY 2019 and FY2020. Enrollment in tax and accounting programs was 33%, 31%, 25% and 20% of total enrollment at GGU for the years 2017, 2018, 2019 and 2020, respectively. GGU did not include specific plans to address the declining enrollment in tax and accounting programs in the report, but noted that previous cuts to marketing may have negatively impacted in particular the tax and accounting programs. FY 2021 forecasts were revised to restore the marketing budget.

### *Enrollment projections*

GGU's enrollment projections for FY2022-2023 reflect a flat number of new students across all schools with the exception of growth in new veteran students and the JDFlex program. The enrollment projections for FY 2024 included the fall of 2023 and spring and summer of 2024. New student enrollment projections for both FY 2022 and FY 2023 are: 53 for the accounting school, 521 for the Ageno School of Business, 140 for the tax school, 225 for the law school, and 412 for the school of undergraduate studies. Compared to FY 2020, the projections increase new student counts by 18 for the school of accounting, 39 for the Ageno School of Business, 12 for the tax school, 58 for the law school, and six for undergraduate studies.

### *Enrollment management as part of resource planning*

Currently, GGU does not have a long-term strategic enrollment plan and a new Director of Strategic Enrollment Management was internally promoted in February 2021. The institution has invested in market and brand research to assist with realizing enrollment targets and brand development. The institution is actively searching for a vice president for institutional advancement who, along with academic and administrative leadership, will develop a comprehensive strategic enrollment plan.

Without a strategic enrollment management plan in place, it is unclear how GGU plans to address in detail the two areas of significant enrollment decline: international students (50% reduction institution-wide in the last three years) and graduate-level tax and accounting programs (40% reduction between fall 2017 and fall 2019), while monitoring enrollment trends in the business school and the law school. As stated in the GGU's report, even with enrollment growth in other areas, such as undergraduate studies, the decline in international students and graduate-level tax and accounting programs outweighs the expected undergraduate studies growth.

The team recommends GGU move quickly to develop a strategic enrollment management plan to include clearer enrollment projections, build capacity, and also evaluate the many initiatives undertaken and coordinate key academic and administrative owners of initiatives across various areas. The plan should also include an examination of how to recruit the types of students who tend to retain and graduate at GGU, in order to help with retention as a significant contributor to revenue. Evaluation of the plan should include ensuring that resources utilized to implement the plan are aligned with GGU's educational purposes and objectives and can be responsive and agile to market pressure. (CFR 3.4)

### **C. Retention and Completion**

The 2019 accreditation team report recommended that GGU continue to focus on retention and completion rates using their recent methods of collecting and reporting data. At that time, the institution identified several ways to improve student success, including mandatory orientation, alumni mentors for undergraduates, support services, and a new learning management system. The CAL recommended that GGU demonstrate gains in retention and completion using newly implemented methods of collecting and reporting data and provide institutional research reports in their SV report that related to retention and completion by degree program.

GGU's SV report included institutional research reports to demonstrate trends in their retention, stop-out rates by school, and completion rates by degree program and school. (CFR 2.10)

### *Retention Rates*

One-year retention rates for the School of Undergraduate Studies, Schools of Business, Tax and Accounting, and School of Law increased or stayed the same since the last visit in 2019, and remained constant in 2020, despite some significant fluctuations before 2019. In the School of Undergraduate Studies, the one-year retention rate increased to 62% in 2020, up from 54% in 2018. When disaggregated, retention rates increased from 2018 to 2020 among both female and male students and among under-represented minority and majority students. Retention rates also increased with military students, while domestic students saw a dip from 51% to 48% in 2019, later bouncing back to 56% in 2020. Students in the School of Undergraduate Studies who took their first term in a hybrid modality were consistently retained at a higher rate than students who took their first term entirely online or in-person, though likely COVID-19 impacted the 2020 one-year retention rates. Full-time students were also retained at a consistently higher rate than part-time students.

Between 2018-2020, retention rates in the School of Business, Tax, and Accounting were between 58% to 62%, while the School of Law saw an increase in their one-year retention rates during the same time, increasing from 69% to 79%. While there was no significant difference in one-year retention rates among full-time and part-time students and female and male students in the School of Business, Tax, and Accounting, there was a noticeable difference in retention rates between full-time and part-time students in the School of Law, with full-time students and female students retained at a consistently higher rate than part-time students and male students.

In 2018, GGU engaged in an analysis of its admission and bar passage rates, and established an admission policy based on a formula generating an index score that predicts a student's first-year GPA. This is now used as part of its admission criteria. The new admission policy intends to increase retention

and graduation rates, and subsequently success on the bar exam. During the visit, the team inquired about the potential implications of this new admission policy on student demographics. GGU's School of Law tracks demographic data to ensure the new admission practice will not result in unintended negative impact for underrepresented groups of students. The team affirms the importance for GGU to systematize the tracking and analysis of the change in admission policy to ensure equitable opportunities for graduate education and success are supported. (CFR 2.10)

### *Stop-Out Rates*

GGU students are often working learners taking one to two courses a year, so the institution does not view time to graduation to be the most accurate indicator of student success. Between 2015 and 2019, however, full-time students "stopped out" at a lower rate than part-time students. GGU found that the most significant stop-out predictor is a student's first term course modality. Students who took their first term courses online stopped out at a higher rate than those who took a mix of in-person and online courses, or completely in-person courses. As a result of this finding, GGU is reviewing how to best serve their online students, particularly with the pandemic's shift to complete remote learning. It was not clear from the institutional report what has been learned through the quick pivot to remote instruction during the pandemic.

In 2020, GGU changed its definition of a "stop-out" to be someone who failed to re-enroll for an additional course within a 16-month period, as opposed to a 12-month period. The team asked several groups on campus whether the change was temporary due to COVID-19 or will be adopted post-pandemic, and the team received conflicting messages across various groups. The team suggests GGU clarify whether the 12-month or 16-month definition will be used moving forward, and how (post-pandemic) this change in definition and the data collected would help GGU develop more effective and appropriate retention strategies.

### *Graduation Rates*

GGU employs multiple measures when examining graduation and retention, including disaggregated graduation rates, time to completion, retention and stop-out rates, and the WSCUC-developed Unit Redemption Rate (URR) and Absolute Graduation Rate (AGR) for undergraduate student success. In 2017 and 2018, GGU's graduation rates were between the 50<sup>th</sup> and 75<sup>th</sup> percentile of their peers. Both three-year and eight-year graduation rates across GGU's three schools remained mainly flat between 2011 and 2017.

In addition, since 2008, GGU has been disaggregating graduation rates by various student profile variables (gender, race, domestic, international, or military) as well as by learning modality (in-person, hybrid, and online). In response to the CAL recommendation and focus for this SV, GGU provided retention and completion reports by degree program.

### *Undergraduates*

Nearly half of all undergraduate students at GGU seeking a bachelor's degree are enrolled part-time while working more than 30 hours a week, and differ from the needs of traditional 18-23-year-old learners at residential institutions. Reflecting trends nationwide, full-time undergraduate students at GGU graduate at higher rates than students attending part-time. The average three-year graduation rate for part-time undergraduates was 27% for 2011-2017, and 51% for full-time students. In 2019, both the URR and AGR at GGU have been trending in a positive direction, with a 68% URR and a 69% AGR. GGU's seven-year average is 78% URR and 78% AGR, comparable to other regional non-profit institutions.

### *Graduates*

The majority of graduate students in the School of Business, Tax, and Accounting are working professionals taking courses part-time and self-paced. Between 2011 and 2017 the overall three-year average graduation rate for part-time students in the graduate business programs is 45% compared to 77% for full-time students. These rates have remained consistent. International students,

representing the majority of full-time students, have graduated in three years at a higher rate (82%) than both domestic (47%) and military students (58%). With the drop in international graduate student enrollment due to COVID-19, careful monitoring of student retention and graduation among domestic and military students is needed to evaluate how effectively they are supported through matriculation.

The graduation rate of full-time students in the School of Business is 60%, and 54% for part-time students. In the School of Law students graduate on average in three years. On average between 2011-2017, 55% of students pursuing their Juris Doctorate and 72% of LLM students graduated in three years, though the LLM percentage continues to see noticeable fluctuation from year to year. As mentioned in the previous section on retention, the School of Law is regularly examining the relationship between their new admission policy and graduation and retention rates, and bar passage rates.

#### *International Students*

Across GGU, international students consistently graduate at a higher rate than domestic and military students. In the School of Business from 2011-2017, three-year graduation rates for international students had minimal fluctuations with an 82% average, while military students averaged 58%, and domestic students averaged 47%. In the School of Law, three-year graduation rates for international students held fairly steady with an average of 78% while military students' three graduation rates fluctuated significantly with an average of 57%, and domestic student graduation rates averaged 56%.

It appears that international students' full-time enrollment and graduation rates across schools had an overall positive result at GGU pre-pandemic. With the pandemic's negative impact on international student enrollment and retention, it will be critical for GGU to continue to ensure international student success, while concurrently employing strategic approaches to support domestic and military students toward degree completion.

### *Student Support*

In spring 2019, GGU developed a mandatory online student orientation course to provide students with university resources and program information through pre-recorded and live Zoom sessions. While there is limited data to date on the success of this recent online orientation, GGU witnessed initial positive results in online students who completed the online orientation compared to students who did not. However, the data is very limited and became increasingly so since the shift to fully remote learning for all students under COVID-19. According to the institutional report, GGU plans to explore how to navigate scheduling conflicts that prevented students from completing the orientation, though the team did not hear specifics about that initiative during the visit.

GGU also adopted several new digital tools (Microsoft 365, Salesforce) as a result of their 2018 strategic plan to improve the student experience and communication. In May 2020, the Division of Student Success also implemented a texting system that opened up a new communication channel between advisors, team members, and students. In December 2020, a new mobile app was rolled out to allow students to pay their tuition, register for classes, log onto the learning management system, and connect with university departments. GGU also implemented a new online appointment scheduling tool for students to make appointments with staff in the Division of Student Success, Enrollment, Registrar, and Financial Aid. Additional technological updates were launched in Financial Aid and the Registrar to provide students with access to information and communicate with staff.

While the team found GGU to be responsive to learners' need for fluid communication methods and access to information, GGU did not have a clear plan to assess the effectiveness of the variety of tools that were implemented. Collecting data on the usage of each tool will greatly help shape future retention strategies. During the visit, the team found no indication of an overall plan to collect student feedback on these new technologies, and how each contributes to the student experience. In meeting

with various stakeholders across campus, several acknowledged the need to create a retention plan and strategy, but could not point to a person or department leading those efforts.

GGU provides student support in the areas of library services, tutoring and assessment, mentorship programs, disability resources, wellness resources, veteran services, and proactive interventions. While some of these services were offered online before the pandemic, all services including tutoring pivoted online as a result of the shift to remote learning. Additional non-pandemic-related changes in student support services included an Online-Writing Lab (OWL), a mentorship program for undergraduate students, consolidation of the disability resource office across schools, and a shift to an external vendor for student wellness resources. Significantly, GGU secured a \$2 million grant to create the Helen Diller Center for Veterans of US Military Service, with an anticipated launch in 2021, to bolster support for veteran students.

With numerous changes to the student experience at GGU, it is critical for the institution to evaluate the effectiveness of each change, assess how students are navigating and experiencing these new resources, and evaluate their overall impact on student success. The team confirmed during the visit that no assessment plan or approach exists among the Division of Student Success that examines how the individual efforts are contributing to their intended outcomes. The team also learned through several meetings that a retention committee had existed in the past, but had not met since the departure of the dean of students in September 2020. It was also confirmed during the visit with various stakeholders that GGU lacks a vehicle for student feedback across various domains of the educational experience to provide feedback for decision-making. Engaging student voice and feedback will be critical for GGU to effectively support its diverse learner population. (CFRs 2.10, 2.13)

#### *New methods of collecting and reporting data*

According to GGU's institutional report, retention and graduation data are collected and evaluated by the Division of Student Success to ensure advising and student support services are



improving these student success metrics. Further, data are analyzed by deans, program chairs and directors, faculty, and senior leadership.

The institutional report mentioned various systems that are collecting data; it is not clear how these various data points are being harnessed to make meaning of the student experience or how student feedback is systematically collected. For example, data is transmitted in the Salesforce system and sent to advisors regarding students who are “flagged” for at-risk behavior. How are those data used to make meaning of the retention rates and improve those metrics?

During the visit, the team learned that while enrollment, retention, and graduation data are made available on dashboards, it is not clear how systems are integrated to capture a holistic picture of student behaviors that allow support services to address student needs. With the increased investment in recently adopted technological tools, it may serve the institution well to consider how an integrated data model, along with a strategic student support team, can support the collecting, reporting, analysis, and finally, data-informed actions. (CFRs 2.10, 4.1, 4.2, 4.3)

### **SECTION III – OTHER TOPICS, AS APPROPRIATE**

The CAL focused the scope of the Special Visit on (a) finances, (b) enrollment, and (c) retention and completion. Before and during the visit, however, the team learned about widespread concerns concerning a common understanding of shared governance and communication between administration and faculty. These concerns echoed a finding of the WSCUC team from 2019, but they appear to have been compounded by the enrollment and fiscal trends at GGU, particularly the significant expenditure cuts in recent years. The strategic plan had called for deficit-funded investments to accelerate enrollment, grow revenue, and achieve fiscal balance by FY 2021, but subsequent enrollment and revenue gains were eroded by the depression of international student enrollment and decline in tax/accounting enrollments. Citing these factors, the university began a series of cuts,

including the termination of one academic dean and the consolidation of academic program oversight under three deans. The president, with the board's endorsement, called for the restructuring of the curriculum of the Ageno School of Business and implemented a university-wide cost restructuring effort.

The team noted that the university undertook more restructuring following the onset of the COVID-19 crisis in March 2020, including a suspension of matching contributions to the university's 403(b) plan and additional employee layoffs and furloughs. Around that time, faculty in the business school expressed "no confidence" in the president and the chief operating officer (COO).

In response to the expression of no confidence, a special committee of the GGU board investigated the allegations that had been brought forward. Following their investigation, the trustees expressed support for the president and the COO. Recognizing the need for enhanced communication, the president initiated a weekly 30-minute "community zoom" forum. He also added members to the "Levers of Change" advisory committee and invited faculty to outline their preferred process for discussing and achieving a common understanding of shared governance. Further cost-cutting measures followed, however, to respond to the board's mandated expenditure reduction before the start of the 2020-21 fiscal year. The measures that were taken included the elimination of some 27 positions (approximately ten percent of GGU's full-time workforce), including two of the five administrators who had expressed no confidence in the administration; the vice president of academic affairs (VPAA) returned to the faculty in May, 2020, and that position remains vacant.

During the SV, the team asked questions to understand the recent history, magnitude, and impact of communication concerns between faculty and administration. The team also inquired about the extent to which the faculty, administration, and board had been able to forge a consensus definition and understanding of shared governance, along with the respective roles and responsibilities, as recommended by the Commission Action Letter. The team also took into account comments received

from various members of the GGU community through the confidential email account that WSCUC established.

The team evaluated their findings within the context of the following CFRs:

- 3.6 Leadership operates with integrity, high performance, responsibility, accountability
- 3.7 Clear, consistent decision-making structures and processes; priority to sustain institutional capacity and educational effectiveness
- 3.10 Effective academic leadership by faculty

Concerning the aforementioned CFRs, widespread feedback received from faculty and staff alike during the visit pointed to significant dissonance between the GGU environment as it was described in the institutional report and the perception by faculty and staff. During the visit, it became clear that serious tensions exist over perspectives regarding the opportunities that the administration affords to faculty to provide meaningful feedback, and on faculty governance, and that these tensions are not limited to a few vocal members of the faculty.

Based on the consistency of the feedback across many members of the community, the team concluded that many faculty felt they were rarely able to provide meaningful input regarding such issues as workforce reductions, curricular streamlining, or program modifications. The communication problems may have been exacerbated by the fact that the VPAA position had been left vacant for an extended period, as well as the high number of interims in senior positions. During the visit, the team learned that the university plans to move forward with the creation of a chief academic officer (CAO) through a collaborative process that entails broad input into the job description and the selection of the candidate. This could well facilitate movement towards a more effective shared governance experience. While not the focus of the special visit but salient to understanding the institution's current climate, the team was not provided with any evidence of a common definition of shared governance at GGU, and to the extent that such a consensus definition does not yet exist, the team recommends a concerted effort to achieve it as soon as possible, especially in light of the search for a new CAO.

The team noted that several of the issues related to faculty and staff morale were already apparent during the 2019 visit, resulting in recommendations of the Commission Action Letter. The CAL recommended that human resource functions and services be enhanced, “including regular and routine evaluations of staff” (CFR 3.2), two-way communication between faculty and administration be improved (CFRs 3.6, 3.7), and that there be a “consensus definition and understanding of shared governance and the respective roles and responsibilities of faculty and administration.” (CFRs 3.7, 3.10) It is clear that these issues remain, and have been compounded by recent budget reductions and the move to remote learning and operations under COVID-19, which have necessitated a more rapid pace of change. Even though they were not the specific focus of this SV, it does appear that little progress has been made in these areas that are important to the operations and effectiveness of an institution.

The central question posed by the team is whether the tensions around shared governance, communication, and rapid change have adversely impacted educational effectiveness and the student experience. In short, can the faculty, staff, and administration work collaboratively to address GGU’s current enrollment and fiscal challenges? The team was concerned that if current trends continue, the institution may find itself out of compliance with WSCUC Standards.

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

The site team commends GGU for the following:

1. A strong and deeply held commitment to GGU’s historic mission and the success of a diverse student body that is widely shared by the board, administration, faculty, and staff.
2. The dedication of staff and faculty who have stepped up during the pandemic and worked long hours to focus on students’ educational needs, often by taking on additional responsibilities due to the remote environment and budget cuts.
3. Recognition of the precarious situation of GGU’s long-term viability, and making difficult decisions on expenditures, while developing new programs and beginning a branding exercise as foundational to student recruitment.
4. Successful fundraising efforts and the establishment of the Helen Diller Center for Veterans of US Military Service, which aligns with GGU’s mission and strategy.

The team recommends that GGU:

1. Continue to focus on long-term viability, ensure that the expenditure reductions are appropriate and sustainable, while also emphasizing revenue generation and creating a strategic enrollment plan. (CFR 3.4)
2. Place greater priority on retention by developing a plan with goals and milestones, assessing the effectiveness of recent student support initiatives, and putting in place an infrastructure for continuous data analysis and student feedback. (CFRs 2.10, 4.3)
3. Review staffing levels to ensure they are adequate and sustainable for operational effectiveness and meeting student needs, and solidify a senior leadership team with fewer interim appointments and clearly defined responsibilities. (CFRs 3.1, 3.6, 3.7)
4. Develop protocols to assess the effectiveness of communication between the faculty and the administration, and make improvements as needed to provide meaningful opportunities for faculty input. (CFR 3.7)
5. Develop and codify a definition of shared governance that clarifies roles and responsibilities of the board, administration, and faculty, as well as processes and timelines for faculty input into decisions affecting GGU's educational purposes, quality, and character. (CFRs 3.7, 3.10)