

APPROVED PROPOSAL
June, 2017

Thematic Pathway for Reaffirmation (TPR)

Overview of the Proposal

Rationale

This Thematic Pathway for Reaffirmation (TPR) proposal emerged from several motivating forces: as part of WSCUCs regular review and refinement of the handbook and standards; as a response to a national conversation on ways to improve peer review accreditation; and as a means of addressing recommendations issued by several national organizations. A consistent theme was that all institutions need not be subject to the same review process. As a result, the Commission is proposing to offer a risk-sensitive approach for reaffirmation of accreditation in addition to the current Institutional Review Process (IRP).

One critique of the 2013 *Handbook of Accreditation (Revised)* noted that the thematic approach, part of the previous institutional review process and a valuable stimulus for institutional improvement, was virtually eliminated. The TPR brings themes back as part of the institutional review. Institutions identify areas of study that align with the WSCUC Standards to demonstrate educational improvement. In the TPR, institutions provide evidence of compliance with the WSCUC Standards and federal regulations and address one or more self-selected themes, in lieu of responding to all of the components in the current IRP.

Consistent with the recommendation from the 2012 Task Force of the American Council on Education (ACE), this pathway puts into place a mechanism that enables WSCUC “to screen institutions in ways that assess key performance indicators and the levels of attendant risk and to calibrate the nature and extent of the accreditation review accordingly” [ACE Task Force report]. Only those institutions with consistent evidence of a healthy fiscal condition, strong student achievement indicators, and sustained quality performance will be eligible for this process for reaffirmation.

The benefits of this process are many. While many WSCUC institutions continuously engage in a process of self-review and educational improvement, those institutions with strong performance in all three areas noted above (fiscal, student outcomes, and quality performance) will benefit from TPR as the themes they select will emerge from what they identify as needing further improvement or study. TPR also allows these institutions to demonstrate what they are doing to enhance educational quality within the context of their own institutional goals and mission. In addition, this Thematic Pathway will allow WSCUC to better deploy its resources toward the specific needs of those institutions that most benefit from the existing IRP.

Description

As another pathway for the review process for reaffirmation (as described in the *Handbook of Accreditation*), institutions (identified on a case by case basis) will have the option/opportunity to demonstrate compliance with all standards through a document review (completing Component 2 of the current institutional review process) and will then undertake a self-study that focuses on a topic or topics chosen by the institution and related to one or more of the standards (completing Component 8). In addition, the institution will complete Component 1 to provide a brief overview of the institution and its response to previous Commission recommendations. The institution will not need to complete Components 3, 4, 5, 6, 7, and 9. Details by component include:

Component 1: Introduction. Institutions will briefly describe the institution, significant changes since the last accreditation review, and the institution's response to past Commission recommendations. (Component 1 is described on page 28 of the *Handbook of Accreditation*.)

Component 2: Compliance with Standards. For the document review, institutions will complete a revised version of the "Inventory of Educational Effectiveness Indicators" (IEEI) and a different version of the "Review under the WSCUC Standards and Compliance with Federal Requirements." (Component 2 is described on page 28 of the *Handbook of Accreditation*.)

Component 8: Institution-Specific Themes. Institutions will concentrate their attention on themes they select: those areas they deem most important and/or in which they seek to improve without undertaking a comprehensive analysis of all of their institutional programs and services. In Component 2, the institution will provide documentation relative to standards and federal requirements not addressed within its institution-specific theme(s). (Component 8 is described on page 34 of the *Handbook of Accreditation*.)

Institutions that participate in the TPR will also complete the Annual Report and participate in the Mid-Cycle Review, as required of all institutions.

Review Process

The review process will be a streamlined version of the current Offsite Review (OSR) and Accreditation Visit (AV) and will be as rigorous as the current institutional review process. A single team will conduct both the documents review and the site visit, without the current six-month lag between OSR and AV. The team of three to five peers will review the institution's response to past Commission recommendations (Component 1), the institution's compliance with the standards and federal requirements and its response to the IEEI (Component 2), and the institution's analysis of areas it has defined for itself as being most important or needing improvement (Component 8). When the review is completed, the team will recommend to the Commission whether the institution may or may not be eligible for the Thematic Pathway for Reaffirmation for its next reaffirmation of accreditation. If eligible, the institution would still need to apply.

The chart below summarizes the differences between the current institutional review process and the proposed streamlined institutional review process:

Elements	Current Institutional Review Process	Thematic Pathway for Reaffirmation (TPR)
Document(s) prepared by institution	Two (institutional report and response to Lines of Inquiry)	One (institutional report)
Required components (evidence for reaffirmation of accreditation) for institutional and team reports	Components 1, 2, 3, 4, 5, 6, 7, and 9 (and one optional component--8)	Components 1, 2, and 8
Interval between OSR and AV	Six months	None
Number of days team spends together reviewing the institution	Four days: one day for Offsite Review (OSR) and three days for Accreditation Visit (AV)	Up to three days for site visit
Number of team trips	Two trips (one for OSR to WSCUC office in Alameda and one for AV to institution)	One trip to institution

Eligible Institutions

Procedures will be put in place to identify institutions eligible for the new process at the time of their next reaffirmation for accreditation. Up to four years in advance of the date of an institution’s scheduled Offsite Review, those institutions that were reaffirmed for nine or ten years will be sent a form called “Request to be Considered for Thematic Pathway for Reaffirmation (TPR).” Institutions that were not reaffirmed for nine or ten years can petition the Commission to make their case for the Thematic Pathway for Reaffirmation. The form will list the specific eligibility criteria (see below), and institutions will return the form indicating whether they wish to be considered for this Thematic Pathway. For those institutions that express an interest in TPR, WSCUC staff will conduct an analysis to determine the institution’s eligibility. Proposed eligible institutions will be placed on a Commission consent agenda. The Commission may remove or add institutions, as it deems appropriate. The Commission’s determination of which institutions are eligible for the TPR is final. There will be no appeals process. Eighteen to 24 months before the date of their Offsite Review, institutions approved for the TPR will create a brief document identifying theme(s) that would be addressed in Component 8, the rationale for selecting the theme(s), and the link between each theme and a standard, core commitment, and/or CFR.

Document length will not exceed five pages. WSCUC staff will review and approve proposed theme(s).

After a visit under the current Institutional Review Process, if a peer review team recommends 10-years reaffirmation and concludes that the institution meets the criteria for TPR, the team can recommend to the Commission that the institution be eligible to apply for the TPR for its next reaffirmation of accreditation.

Eligibility Criteria

To be eligible for the Thematic Pathway for Reaffirmation institutions will need to meet certain criteria that are derived from the three Core Commitments, as described in the *Handbook of Accreditation*, and from their past accreditation history and interactions with WSCUC. These criteria rely on existing data sources; no new data will be requested of institutions. Note: The criteria listed below are merely initial screening indicators and are not designed to encompass the totality of each core commitment. Each institution will be reviewed on these criteria by WSCUC staff to determine eligibility.

Core Commitment: Student Learning and Success

“Institutions have clear educational goals and student learning outcomes. Institutions collect, analyze, and interpret valid and reliable evidence of learning as a way of assessing student achievement and success. Institutions support the success of all students and seek to understand and improve student success.”

- Compliance with CFR 1.2. CFR 1.2 requires that institutions regularly generate, evaluate and make public data about student achievement, including measures of retention and graduation, and evidence of student learning.
- Inventory of Educational Effectiveness Indicators (IEEI). The IEEI shows whether an institution collects and uses evidence of student learning and performance for improvement.
- Undergraduate retention/graduation rates.
- Graduate retention/graduation rates.
- Previous Commission action letter for reaffirmation. WSCUC staff will confirm that the letter does not indicate any significant issues with student learning and success.

Core Commitment: Quality and Improvement

“Institutions are committed to high standards of quality in all of their educational activities. They use appropriate evidence to improve teaching, learning and overall educational effectiveness. Through strategic and integrated planning, institutions demonstrate the capacity to fulfill their current commitments and future needs and opportunities.”

- IEEI. The IEEI shows whether an institution has regularly scheduled program reviews for its degree programs and whether an institution collects and uses

- evidence of student learning and performance for improvement.
- Strategic plan. The institution’s strategic plan, if available on its website, will be reviewed to verify that the institution has an ongoing process for strategic planning.
- Previous Commission action letter for reaffirmation. WSCUC will confirm that the letter does not indicate any significant issues with quality and improvement.

Core Commitment: Institutional Integrity, Sustainability and Accountability

“Institutions recognize that the public has entrusted them with the critical responsibilities of upholding the values of higher education and contributing to the public good. They engage in sound business practices, demonstrate institutional integrity, operate in a transparent manner, and adapt to changing conditions.”

Note that the criteria listed below are primarily financial indicators used by the US Department of Education to monitor the status of institutions.

- Cohort default rate. The institution’s three-year cohort default rate must be 5% or less for an institution to be considered (cut-off point set by the Commission).
- Composite financial index. The institution’s composite score for the last three years must be greater than 1.5 to be considered (cut-off point set by the US Department of Education).
- Heightened Cash Monitoring. Institutions appearing on the US Department of Education watch list (HCM 1 or HCM 2) will not be eligible.
- Enrollment patterns. Enrollment swings (increase or decrease) of greater than 20% (cut off point set by WSCUC staff) will be reviewed on a case-by-case basis to determine whether an institution could be eligible.
- Previous Commission action letter for reaffirmation. WSCUC will confirm that the letter does not indicate any significant issues with integrity, financial viability, governance, and accountability.

Accreditation History and Interactions with WSCUC

- Length of time of last reaffirmation. Only institutions receiving nine or ten years (until 2026) or ten years (after 2026) will be invited to apply for the TPR. Institutions that can demonstrate considerable strength in the stated criteria—student outcomes, quality performance, and financial sustainability—may petition the Commission for consideration.
- Notice of Concern or Sanctions. Institutions issued a Notice of Concern or Sanction since their last reaffirmation for accreditation will be ineligible.
- Interactions with WSCUC in the interval between reaffirmations: special visits, interim reports, progress reports. These will be reviewed on a case-by-case basis to determine eligibility.
- Signs of instability from the WSCUC database. High turnover in senior leadership or significant changes in offsite locations may render an institution ineligible.

- Results of the Mid-Cycle Review. WSCUC staff will examine the results of the MCR, if available.
- Substantive Change and Structural Change history. Problematic sub change proposals or a recent structural change that involved change of legal status, ownership or control (within the last three years) may make an institution ineligible for the Thematic Pathway for Reaffirmation.

Appendix A summarizes the eligibility criteria for the TPR.

Implementing the Thematic Pathway for Reaffirmation

Input from the Region

ARC. On April 16, 2016, an open session was held at the ARC for participants to discuss a possible new process for reaffirmation of accreditation. Seven Commissioners, three WSCUC staff members, and 18 institutional representatives attended. Comments from the participants helped inform this proposal.

Working group from the region. Twelve representatives from the region worked on this proposal. See Appendix B for the members of the working group.

Launching the Thematic Pathway for Reaffirmation

Phase-in. There will be no pilot process. Rather this Thematic Pathway for Reaffirmation will be launched as a variant of the current institutional review process for reaffirmation of accreditation and be phased in over three years. In order to expedite the phase-in process, institutions scheduled for reaffirmation in fall '19 and spring '20 will have about two years, if deemed eligible, to prepare and host the accreditation visit in fall '20. This group will be deemed the first cohort. Institutions scheduled for reaffirmation in fall '20 and spring '21 will have about three years. Institutions scheduled for fall '21, spring '22 and beyond will have four years. Appendix C lists the institutions that were reaffirmed for nine or ten years and are scheduled for reaffirmation in fall '20 through spring '22.

First cohort. There are 20 institutions scheduled for an Offsite Review in fall '19 or spring '20. Of those, eleven institutions were reaffirmed for nine or ten years. The eleven institutions are:

Nine Years
Alliant International University
Pardee RAND Graduate School
Pomona College
Samuel Merritt University

Ten Years
California Institute of Technology
California State University at Long Beach
Loma Linda University
Naval Postgraduate School
Santa Clara University
Soka University of America
UC San Francisco

Once the proposal has been reviewed by the region and formally approved by the Commission, institutions above will be sent, in summer 2017, the form “Request to be Considered for the Thematic Pathway for Reaffirmation.” The form will list the specific eligibility criteria and institutions will indicate whether they wish to be considered. WSCUC staff will undertake an analysis of eligibility criteria for those institutions expressing an interest in the streamlined institutional review process. A list of the institutions that meet the eligibility criteria will be submitted to the Commission for approval at its November 2017 meeting. Those institutions that are approved for the Thematic Pathway for Reaffirmation will become the first cohort.

Timeline for the First Cohort

Institutions in the first cohort would have their accreditation visits in fall 2020. WSCUC staff will create materials and procedures, select peer review teams (using the same criteria in place for selecting team members for the current institutional review process), conduct team training, conduct institutional training, develop evaluation procedures to assess the effectiveness of this pathway, and plan for the institutions scheduled for Offsite Reviews in spring ‘21 and beyond that might be eligible for this Thematic Pathway for Reaffirmation. See Appendix D for the timeline for the approval and launch of the first cohort.

Appendix A:
Eligibility Criteria for
Thematic Pathway for Reaffirmation

CFR 1.2

- Does the institution meet CFR 1.2 (publicly presents on its website retention and graduation data and evidence of student learning)?

Strategic Plan

- Does the institution engage in an ongoing process of strategic planning?

Undergraduate Retention/Graduation Rates

- What is the institution's four-year graduation rate (IPEDS)?
- What is the institution's six-year graduation rate (IPEDS)?
- What are the disaggregated rates (IPEDS)?
- What is the institution's Absolute Graduation Rate (WSCUC Graduation Rate Dashboard)?

Graduate Retention/Graduation Rates

- What is the institution's graduation rate or completion rate as posted on its website?
- Does the institution distinguish between masters and doctoral rates?

Financial Indicators

- What is the institution's cohort default rate?
- What is the institution's composite financial index?
- Is the institution on the Department of Education's Heightened Cash Monitoring list?

Enrollment Change

- What have been the changes, if any, in enrollment over the last three years?

Inventory of Educational Effectiveness Indicators

- Do all programs have learning outcomes?
- Do all programs have and consistently use assessment of student learning?
- Does the General Education program, if offered, have learning outcomes and have learning outcomes been assessed?
- Do all programs have or have scheduled program review?

Interactions with WSCUC

- What is the length of time since the last reaffirmation?
- Is the institution on Notice of Concern or Sanction?
- Has the institution had follow up requirements since the last reaffirmation (Special Visit, Interim Report, Progress Report)?

- Have there been problematic substantive change proposals?
- Has the institution undergone a structural change in the last three years?
- Has the institution experienced instability in senior leadership?
- Has the institution experienced significant changes in offsite locations?
- What are the results of the Mid-Cycle Review, if available?

Commission Letters

- Have there been Commission concerns about student learning, assessment, student success? (Core Commitment One)
- Have there been Commission concerns about standards of quality, program review, educational effectiveness, improvement efforts? (Core Commitment Two)
- Have there been Commission concerns about integrity, financial sustainability, governance, accountability? (Core Commitment Three)

**Appendix B:
Members of the Working Group**

Co-Chairs		
John Derry	President	Hope International University
Sharon Salinger	Professor of History, Emerita	University of California, Irvine
Members		
Linda Buckley	Associate Vice President for Planning	University of the Pacific
Ron Carter	Provost and Executive Vice President for University Affairs	Loma Linda University
Fred Fehlau	Provost	Art Center College of Design
Joseph Hoey	Associate Provost	National University
Margaret Kasimatis	Vice Provost for Strategic Planning and Educational Effectiveness	Loyola Marymount University
Kay Llovio	Chief Student Life Officer	William Jessup University
Lynn Mahoney	Provost and Vice President for Academic Affairs	California State University, Los Angeles
Wendy Pearson	Academic Affairs Program Officer	University of Hawaii, Manoa
Monique Snowden	Vice President of Institutional Planning and Effectiveness	Fielding Graduate University
Karen Solomon	Vice President for Accreditation Relations and Director, Standard Pathway	Higher Learning Commission

**Appendix C:
List of Potentially Eligible Institutions for this Thematic Pathway for Reaffirmation
by Semester of Offsite Review**

Offsite Review Scheduled for Fall '20 (If Eligible, Accreditation Visit in Spring '21)

Nine Years

California Institute of the Arts
University of San Diego

Ten Years

Harvey Mudd College
University of Hawaii, Manoa
University of Southern California

Offsite Review Scheduled for Spring '21 (If Eligible, Accreditation Visit in Fall '21)

Nine Years

Azusa Pacific University

Ten Years

California State University, Northridge
Occidental College

Offsite Review Scheduled for Fall '21 (If Eligible, Accreditation Visit in Spring '22)

Nine Years

Whittier College

Ten Years

Claremont McKenna College
Cal Poly San Luis Obispo

Offsite Review Scheduled for Spring '22 (If Eligible, Accreditation Visit in Fall '22)

Nine Years

Chapman University

Ten Years

Marshall B. Ketchum University
Scripps College
University of California, Irvine

**Appendix D:
Timeline for First Cohort Under the Thematic Pathway for Reaffirmation**

WHEN	WHO	WHAT
February 2016 Commission Meeting	Commission	Discuss revised proposal and decide whether to continue with development
April 2016 ARC	Co-Chairs of the Working Group of Representatives from the Region	Hold open meeting for informal conversation about additional pathways for the institutional review process
June 2016 Commission Meeting	Commission	Discuss feedback from ARC and decide whether to continue
Summer 2016	WSCUC Staff	Develop strategy for interpreting graduation rates
September 2016- December 2016	Working Group of Representatives from the Region	Review and modify, as needed, the work to date and prepare draft proposal for Commission
November 2016 Commission Meeting	Commission	Review draft proposal from working group and provide feedback
February 2017 Commission Meeting	Commission	Discuss next iteration of working group's proposal, revise as needed, decide whether to approve distribution of the draft proposal to the region for comment
February – April 2017	Commission	Hold meetings, as appropriate or requested, for conversations about this proposed new pathway
April 2017 ARC	Commission	Hold open meeting on this Themed Pathway
June 2017 Commission Meeting	Commission	Discuss proposal and feedback from region; formally approve and launch new pathway
Summer 2017	WSCUC Staff	Contact the eleven potential institutions for first cohort; conduct analyses to determine eligibility
November 2017 Commission Meeting	Commission	Approve eligible institutions
September 2017 – June 2018	WSCUC Staff	Develop materials to support teams and institutions; compose peer review teams
Spring 2020	WSCUC Staff	Train teams
Fall 2020	Review Teams	Conduct Accreditation Visits
February 2021 Commission Meeting	Commission	Reaffirm accreditation for the first cohort of institutions reviewed under this Thematic Pathway