REPORT OF THE WSCUC TEAM
For Reaffirmation of Accreditation

To

United States University

March 8-11, 2022

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SECTION I – OVERVIEW AND CONTEXT

I.A. Description of Institution and Accreditation History

United States University (USU), located in San Diego, California, was founded as InterAmerican College (IAC) in 1997. The institution, with its keen focus on diversity, equity, and inclusion, was originally a non-profit institution that was designed to provide private liberal arts education that was "personalized" to underrepresented populations, including Latinx, first-generation college students, and immigrants. The original curriculum was designed to build bilingual capacity in nursing, healthcare, and education in Southern California to assist underserved populations.

In 2005 WSCUC granted candidacy to IAC and, in 2009, initial accreditation. In 2010, IAC underwent a structural substantive change, changed its name to United States University (USU) and converted to for-profit status. In 2017, Aspen Group, Inc. (AGI) assumed ownership of USU and entered into a service level agreement (SLA) for the purpose of establishing a "shared services protocol" intended to provide the infrastructure to support USU so that USU could focus on teaching and learning.

Throughout its history, USU has continuously communicated with WSCUC and has worked collaboratively to maintain institutional accreditation. Since its acquisition by AGI, USU has had Special Visits in 2018 and 2019. In its latest action letter of July 8, 2020, the Commission required USU to respond to the following:

1. Continue to set and evaluate realistic enrollment targets (CFR 3.4). Formally describe and document:
   a. the process for doing so;
   b. the role of marketing, academic leadership, institutional research, and the admissions office in setting those targets; and

       c. regular assessment and evaluation of actual performance in meeting the targets.

2. Continue to monitor financial performance (CFR 3.4). Formally describe and document:
   a. the annual operating plan development process (AOP), including how past performance guides and informs that process;
   b. monthly, quarterly, and annual monitoring and reporting of financial performance relative to plan, including university-defined financial and operational KPI's; and
   c. financial costs associated with the SLA services provided by AGI.

3. Review and amend, as appropriate, the Service Level Agreement to minimize potential risks to the institution and maximize its financial sustainability by (CFRs 1.7, 2.13, 3.5, 3.7):
   a. clearly defining and documenting the functional services that AGI provides to USU;
   b. establishing the methodology for determining the costs associated with those services; and
   c. formulating and documenting a framework for how USU will regularly assess, evaluate, update, and communicate the quality and efficacy of those services that includes specific criteria for review and timelines for renegotiation.

USU's mission is as follows:

USU provides professional and personal educational opportunities, with a special outreach to underserved groups. Through campus and online programs, the university offers affordable, relevant and accessible undergraduate and graduate degree programs and certificates in a supportive student-centered learning environment. (USU Mission Statement)

USU offers on-campus and online bachelor's and master's degree programs as well as various non-degree programs through its three colleges: The College of Nursing and Health Sciences (six programs), the College of Education (six programs), and the College of Business and Technology (ten programs). USU's report indicated total student enrollments of 2,629 in Spring 2021, with 173 undergraduates and 2,456 graduate students. The average student

age is 40, with approximately 80% female. In terms of diversity, the student population is 2/3 people of color. USU draws its students almost entirely domestically, with students from 46 states.

Among the three colleges, the highest student population is in the College of Nursing and Health Sciences (2,467) followed by the College of Business and Technology (72), and the College of Education (42). In addition, there are non-degree seeking students (48).

B. Description of Team's Review Process

The team reviewed USU's institutional report and supporting documents provided to the team in the summer of 2021. The team analyzed the available material and conducted a team meeting in August. The team conducted the Offsite Review (OSR) on September 20-21, 2021. At the end of the OSR, the team met with key USU constituents to present the commendations, recommendations, and lines of inquiry. A lines of inquiry (LOI) document was provided to the institution at the conclusion of the OSR.

The LOI stated that the team would focus during the Accreditation Visit on issues related to the relationship between AGI and USU, financial sustainability and resource allocation, strategic planning, assessment and institutional research, student success, and program review and educational effectiveness.

The Accreditation Visit was conducted on March 8-10, 2022, via Zoom and consisted of meetings with a multitude of institutional constituencies. For those unable to participate in a meeting or interview, a confidential email account was made available to all students, faculty, and staff, and the assistant chair monitored the account during the visit. It was clear to the team

that the USU community embraced the accreditation process and were candid in their responses to the team's questions.

C. Institution's Accreditation Report and Update: Quality and Rigor of the Report and Supporting Evidence

USU submitted a well-written, well-organized, and thoughtful report. The institutional report was responsive to WSCUC requirements as well as intentional in its reflections regarding challenges and potential opportunities. USU provided sufficient evidence in most areas to support its action plans and claims. In some areas, detailed supporting evidence was not included, but each of these areas became a line of inquiry for the team to pursue during the Accreditation Visit.

Multiple university constituencies were engaged in the self-study process. The accreditation steering committee was a derivative of the strategic planning committee with representation from the faculty senate and university council. This committee organized the self-study by assigning members to different component teams, who in turn engaged core and adjunct faculty and staff. The steering committee continued to meet independently and then collectively to draft the final report. The USU team described an inclusive process that supported inter-departmental learning. The final draft report was reviewed with the various constituencies (board, staff, faculty, students) and posted to the website.

SECTION II – EVALUATION OF INSTITUTIONAL ESSAYS

Component 1: Response to previous Commission actions

The team reviewed the progress of United States University (USU) in response to the following Commission recommendations from its letters of June 2015 (Accreditation Visit), March 2019 (Special Visit) and July 2020 (Special Visit).

1. Focus on mission of providing educational opportunities to underserved populations (CFRs 1.1, 1.4)

2. Articulate a comprehensive assessment plan (CFRs 2.2, 2.3)

3. Ensure the quality and rigor of academic programs. (CFRs 2.6, 4.1)

4. Assess and monitor the institution's capacity to support transfer students with any needed remediation and/or support programs and offerings. (CFRs 2.10, 2.14)

5. Develop a plan for assessing effectiveness of all student advising services/co-curricular activities .(CFRs 2.11, 2.12, 2.13)

6. Regularly assess the Service Level Agreement. (CFRs 2.13, 3.5)

7. Continue to set and evaluate realistic enrollment targets; continue to monitor financial performance relative to plan. (CFR 3.4)

8. Clarify the decision-making process for the selection and development of the academic program portfolio including degree levels and content areas. (CFRs 3.7, 3.10)

9. Ensure that the board of trustees continues its active and independent role in guiding the institution. (CFRs 3.9, 4.7)

10. Complete the strategic plan and establish protocols for monitoring its progress and outcomes. (CFRs 4.1, 4.5, 4.6)

Overall, the team concluded that USU has taken seriously and satisfactorily addressed the above recommendations. USU's progress in addressing the Commission's recommendations is described in the remainder of this report.

Component 2: Compliance WSCUC Standards and Federal Requirements

As required by WSCUC and articulated in the 2013 WSCUC Handbook of Accreditation (Revised 2021), United States University (USU) submitted the Compliance with WSCUC Standards and Federal Requirements Worksheet. In the following sections, USU's compliance with the standards is analyzed and summarized, based on evidence provided in the institutional report and information gathered during the Accreditation Visit.

Standard 1: Defining Institutional Purposes and Ensuring Educational Objectives

<u>Institutional Purposes</u>

The mission of USU, as reflected on its website and in its institutional report, is to provide "professional and personal educational opportunities, with a special outreach to underserved groups. Through campus and online courses, the University offers affordable, relevant and accessible undergraduate and graduate degree programs and certificates in a supportive student-centered learning environment." Its mission is appropriate to an institution of higher education and clearly defines the ways in which it contributes to the public good. (CFR 1.1)

These include the university's accessible on-line delivery methodology, affordable tuition, and "pay-as-you go" monthly tuition payment plans (MPP). The institution states that 64% of

students currently utilize the MPP.

Integrity and Transparency

The institution has an articulated commitment to diversity, inclusion and equity (CFR 1.4). Its founding purpose was to provide educational opportunities for underserved populations such as working adults, Latinx, first-generation college students, and immigrants to increase bilingual capacity in nursing, healthcare, and education in Southern California. It has expanded to offer weekend immersion experiences for students in the Family Nurse Practitioner programs in San Diego, California; Phoenix, Arizona; Austin, Texas; and Tampa, Florida.

USU's student body, faculty, and staff reflect the diversity to which it is committed. As of spring 2021, USU's student ethnicity profile was White (35%), Asian American (26%), Hispanic (16%), African American (17%), Native Hawaiian/Pacific Islander (1%), Native American (1%), and two or more races (2%). USU faculty are 27% male and 73% female. USU's faculty ethnicity profile is White (45%), Asian American (7%), Hispanic (6%), African American (13%), Native Hawaiian/Pacific Islander and Native American (less than 1%), two or more races (3%), and remaining unknown (23%). Staff at USU totals 86. For staff, 36% are male and 64% are female. USU's staff ethnicity profile is White (49%), Asian American (5%), Hispanic (20%), African American (15%), Native American (1%), and remaining unknown (10%). The university has recently created a university-wide committee focused on diversity, equity and inclusion (DEI) efforts designed to support campus climate and student success. (CFR 1.4)

USU is owned by the Aspen Group, Inc. (AGI) with which it also has a service level agreement (SLA). Although AGI has "veto rights" over key decision areas, including the selection of the university president and members of the board of directors, it was clear to the

team from its review of university materials and discussions with USU and AGI leadership that the university maintains the academic oversight and authority appropriate for an educational institution. (CFR 1.5)

The institution appropriately represents its programs, and costs, and has clear policies and procedures, including grievance procedures. It publishes audit reports, maintains financial records, and has clearly communicated with WSCUC and the review team. (CFR 1.6-1.8)

Conclusion

The team's finding, which is subject to Commission review, is that United States University has provided sufficient evidence to demonstrate compliance with Standard 1. Final determination of compliance with the Standards rests with the Commission.

Standard 2. Achieving Educational Objectives through Core Functions

Teaching and Learning

USU's institutional report, appendices, and interviews during the visit demonstrated how the institution has thoughtfully considered its teaching and learning processes to successfully achieve its educational mission and objectives. The team reviewed samples of course syllabi, the learning management system, the faculty handbook, faculty course evaluations, faculty policies, and comments from faculty and student interviews to gain a full understanding of how the university puts its philosophy into practice.

USU's courses are staffed by faculty qualified in education and experience for the programs to which they are assigned. USU has low faculty turnover; therefore, the university is able to enjoy the benefits of faculty longevity and institutional history. There is a large portfolio

of degrees available, but all have the focus of preparing USU students to serve in diverse, complex career paths now and in the future.

Courses are taught by 264 full- and part-time, core and adjunct faculty. The 14 core faculty serve as the "lead" subject matter experts and are responsible for the quality of the development and delivery of courses. The average current teaching load for full-time faculty is two courses per session with a student-to-teacher ratio average of 25:1 with available release time for assessment, curriculum development, scholarship, and service to the community. The faculty scheduling abides by a workload model based on the Carnegie Unit and student hours to equitably facilitate the university's teaching, research/creative activities, service missions, and to ensure that faculty workload aligns with federal and state regulatory requirements.

There are expectations for faculty engagement in the online classroom that are articulated to faculty, and there is also a structured template provided to guide course development and the linking of course learning outcomes (CLOs) to program learning outcomes (PLOs) and institutional learning outcomes (ILOs). The syllabi provide validation of the advanced levels of graduate program objectives as compared to undergraduate objectives and have pre-requisites of bachelor's or master's level completion prior to admission to a master's or doctoral course. (CFR 2.2b) However, there is some inequity among the syllabi development, especially from the education program as the syllabi provided to the team did not have student learning outcomes, standards of performance or grade components, while syllabi from other programs were robust in expectations with the student learning outcomes clearly stated at the institutional, program, and course levels throughout. (CFRs 2.3, 2.4)

USU's core functions are enhanced by its strengths with respect to the university's

decision to employ effective data-gathering practices as well as to create clear descriptions of degree requirements and curricular processes. USU's effectiveness in the assessment of student learning and program review continues to evolve and improve as the faculty complete annual iterations. (CFRs 2.2b, 2.3, 2.4, 2.5, 2.6, 2.7) USU is building a strong assessment program, as evidenced by critical mappings, plans for the development of signature assignments, and detailed assessment plans.

All academic programs at USU have established protocols for program review, which are articulated in the program review handbook and assessment plans. These reviews provide a demonstration of alignment of learning outcomes at various levels as well as program review results and recommendations for continuous quality improvement. (CFR 4.7)

The team recommends that USU continue to develop its ability to meaningfully review its programs, including incorporating disaggregated student data in the review, to better inform decision-making. In the future, as noted in the institutional report, USU will be able to disaggregate persistence, retention, and graduation rates based on racial, ethnic, gender, age, economic status, disability, and other categories as the enrollment growth in the smaller degree programs allows for breakouts into these categories. (CFRs 2.10, 2.13)

In terms of new course development, prior to initial launch, every new course is reviewed for quality assurance by instructional designers. Teaching faculty provide feedback after the initial course offering and the course is automatically placed on a revision schedule for future updates, although interim updates can also be incorporated. Faculty meet weekly to evaluate data on student outcomes and faculty outcomes. There are also quarterly faculty pedagogy speakers' series and monthly meetings to discuss best practices and to support faculty development. (CFRs

2.5-2.7)

<u>Scholarship and Creative Activity</u>

USU uses a tool with a faculty module to track scholarship, professional development, conferences, committees, or presentations. Faculty scholarship and professional development is supported by funds budgete by each program dean as part of the annual budgetary process. (CFR 2.8) During the visit, interviews with the faculty senate members revealed there is no current process for rank and promotion of faculty members. (CFR 2.9) However, faculty indicated that this topic may be explored in the future.

<u>Student Learning and Success.</u>

In calendar year 2020, a total of 379 degrees were conferred. The academic advisors monitor student program progression, participation, and attendance, as well as other markers of student engagement. USU monitors academic progress and attendance and regularly reports the data to the program deans with reasons for withdrawal, such as work conflict, medical, family or personal issues.

To support student learning and success, USU contracts for tutoring services.In addition, faculty provide tutoring options for students. Also, embedded within the courses are Turnitin for academic integrity monitoring and a link to the virtual library. (CFRs 2.11-2.13) USU is sensitive to the needs that may arise for students with disabilities as they have formalized processes and procedures in place to provide any required accommodations through their Title IX officer and student advisors.

One highlight of student success is the recently instituted honors society under Sigma Theta Tau in the nursing program to recognize student achievement and connect students with a

national nursing network. This society was instigated by student requests expressed in the satisfaction surveys. The USU nursing administration was immediately responsive to meet this request.

Currently, USU's small size is masking the lack of infrastructure around co-curricular services such as career support, addressing work-life balance challenges, mental health and other key services for students. As growth continues, work is needed to achieve a deeper understanding of the co-curricular services that can assist the university's student population in meaningful ways. (CFR 2.11) USU recognizes this need and stated in its self-study report that it needs to "bolster support services for smaller, growing degree programs with discipline-specific career services and other beneficial co-curricular services."

It will be important for USU to conduct an analysis of USU's student and co-curricular services and consider new offerings to fill gaps in areas such as mental health, job/career counseling, family obligations, personal, medical concerns, and others. (CFR 2.13) The team recommends that USU acquire knowledge of co-curricular services and programs in online environments that address the needs of all USU students and that are designed to support students' personal and professional development in meaningful ways. The team also recommends that USU develop a comprehensive model for student support services in an online context that is regularly assessed. (CFRs 2.11, 2.13)

Transfer student support is well-addressed with the transfer and articulation specialist position created in July 2020 to provide support and advocacy for all incoming transfer students as they acculturate to USU at varying points in their academic journey. USU's transfer of credit policy is published in the catalog and procedure manual on the website. The enrollment team is

trained, and there are regular meetings between enrollment staff, advisors and the registrar to explain any anomalies that may arise to ensure smooth student communications. (CFR 2.14)

Conclusion

The team's findings, which are subject to Commission review, are that United States University provided sufficient evidence in its report, supplemental documentation, and at the site visit to demonstrate compliance with Standard 2. However, the final determination of compliance rests with the Commission.

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

Faculty and Staff

As of the time of the report, USU stated that the university has 14 full time faculty, 250 adjunct faculty, and 86 staff. USU faculty and staff are appropriately credentialed, evaluated, and are given opportunities for professional development. USU partners with its sister institution, Aspen University, for professional development opportunities as well as provides internal faculty development opportunities and supports outside professional development. As discussed earlier in the report, faculty diversity is similar to student diversity in terms of gender and the same races/ethnicities are represented in both populations. Faculty receive training on the learning management system and assessment processes. Faculty sufficiency is managed through a faculty workload model.

Staff sufficiency is supported through ratio-based calculations, taking the expected enrollment for a program divided by the student-to-staff ratio to determine the number of staff required. Other staffing needs are included in the annual budgeting process as well as through

ongoing needs conversations between the provost and president.

All full-time and part-time faculty are evaluated annually taking into account teaching evaluations, end-of-course evaluations, and contributions to the academic field/university. (CFRs 3.1-3.3)

<u>Fiscal, Physical and Information Resources</u>

The team commends AGI's purchase and support of USU, which has improved USU's financial situation significantly -- from deficits in 2015 to enrollment growth beginning in 2018-- resulting in budget surpluses and improvement in composite score from 1.8 in FY19 to 3.0 in FY21. USU is creating plans for greater diversification of revenue sources in its upcoming strategic plan. Currently the Master of Science in Nursing-Family Nurse Practitioner (MSN-FNP) program makes up over 90% of its program enrollments. Through the monthly payment plan option, USU makes education more affordable to students, with only 34% of the students receiving financial aid per the latest Title IV calculation.

USU's financial audits are unqualified, but there have been recurring findings in its compliance with Title IV programs, including two findings that are considered significant deficiencies in the 2021 audit report. The team recommends that USU continue to work with USU's financial aid service provider to ensure appropriate financial aid policies and compliance with Title IV requirements in light of recurring financial aid audit findings. (CFR 1.7, Title IV Compliance Policy)

The team commends USU for embracing the challenge of working with AGI, succeeding in establishing a highly collaborative and successful relationship. USU has greatly benefited from AGI's resources such as marketing, technology, and institutional research–thus allowing USU to grow its enrollment. AGI serves as an online program manager (OPM) for USU and its

sister school, Aspen University. The infrastructural support and service level agreement

operating framework is a document detailing the relationship between AGI and USU. The

operating framework clearly states that the USU board of trustees exercises general oversight

and direction/control of the university. Starting in September 2021, a quarterly document is

prepared by USU to evaluate the performance of AGI. This document is reviewed by the

board's audit committee and is part of the audit committee report to the full board. There is no

legal dispute remediation process but none has been needed due to strong relationships and

ongoing communication between AGI leadership, USU leadership and the USU board to

address any issues.

AGI allocates its costs to USU and Aspen University primarily based upon student

enrollment. USU includes these costs in its budget and receives ongoing reports from AGI in

weekly meetings and at quarterly board meetings about any changes.

USU recently hired a new CFO, who is improving the budget and monthly reporting

processes to include a greater level of detail and insights. USU's budget process is a

bottom-up process, gathering input from all relevant leaders and linking needs to student

population changes. The president and provost have critical roles in the budgeting process.

As needs are identified outside of the annual budget, reallocation decisions are made to

support students.

Distance learning needs are supported by an online learning management system, online

student portal, online library, and resource rooms. Additional technology needs are added based

upon requests from leaders. (CFR 3.5)

Organizational Structures and Decision-Making Processes

USU is overseen by an 11-member board, with one individual representing the parent company while the remaining individuals are independent to the university. The board members have robust backgrounds in higher education and/or subject matter expertise related to the programs offered. The team found the board highly engaged at an appropriate level, aware of the strengths and challenges USU faces, and focused on the importance of diversity, equity and inclusion.

Annually, the board evaluates the president as well as the board's own effectiveness. Thorough onboarding is performed for new board members. The board is actively managing succession planning, for board members as well as senior leadership. The board bylaws are designed to ensure that the board meets its fiduciary responsibilities as well as proper alignment with its owner. (CFR 3.9 and related policies).

USU's executive team is led by a president who has served at USU for nine years, first as provost and then as president. The provost is relatively new to USU but has experience in online graduate education. USU also has a new full-time chief financial officer. (CFR 3.8). The president's cabinet, composed of provost, CFO, deans and other key stakeholders, regularly meet. The team found USU's leadership team highly collaborative, focused on student learning and passionate about USU's mission. (CFRs 3.6, 3.7)

USU has other governance structures such as curriculum and assessment committees per school, a university council, and a faculty senate. The university council is a robust, cross-function committee designed to understand and examine policies as they relate across the university. The faculty senate is an elected faculty governance body through which faculty and administrators work together to implement USU's mission. (CFR 3.10) The team found the

USU faculty and staff dedicated to student learning and success with a strong commitment to the importance of creating a respectful and caring university culture.

Conclusion

The team's finding, which is subject to Commission review, is that United States University has provided sufficient evidence in its report, documentation and online visit to demonstrate compliance with Standard 3. However, the final determination of compliance rests with the Commission.

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

Quality Assurance Processes

USU has made significant progress in outlining a comprehensive quality assurance process in academic areas, focused on assessing programmatic student learning that is detailed in Components 4, 5, and 6 later in this report.

The university developed, with significant contributions from all faculty, newly revised institutional learning outcomes (ILOs) and accompanying undergraduate and graduate program learning outcomes (PLOs). Program curricula are mapped to these learning outcomes, reflecting a scaffolded approach to learning, with continuous depth as the curricular sequencing proceeds. There is an expectation that programmatic student learning outcomes will be assessed on an annual basis, in accordance with the assessment handbook. The team confirmed that these assessments take place.

USU engages in a systematic program review process that is outlined within a handbook and is based on good practices for program review. Assessment of PLOs are conducted at the college level, using faculty-created rubrics and signature assignments that are aligned with

learning outcomes. Assessment rubrics are now being built into the learning management system, which provides an automated process that allows for faster and greater access to assessment data. Assessment results thus far reflect overall student achievement of learning outcomes (usually around 80%) and plans for improvement. (CFR 4.1)

USU's institutional research office and assessment office, provided by AGI, makes available to all university stakeholders the data needed to assess and identify areas for potential improvement. A common theme in the team's discussions with university leaders, faculty and staff was the belief that the arrangement in which AGI provides institutional research services has contributed to an enhanced culture of data-driven decision making. The IR office serves both USU and Aspen University and consists of the director and three staff. The office plays a key role in monitoring student success, providing program directors and deans with end-of-course and program student satisfaction survey results as well as disaggregated student enrollment behavior, retention and graduation data. As enrollments grow, it will be important for USU to assess whether its IR needs will outgrow the current staffing of the Aspen Group IR office. (CFR 4.2)

Institutional Learning and Improvement (CFRs 4.3-4.7)

The team found USU constituents to be committed to continual improvement and learning. (CFRs 4.3). Through participation in assessment processes and faculty development activities, the faculty clearly embraces its responsibilities to ensure students learn what the faculty has set out for them to learn. Courses and curriculum are redesigned when findings indicate this will lead to improved learning. (CFR 4.4)

USU's current strategic plan ends in 2022. In January 2022, faculty, students, and staff

were surveyed to provide direction for an updated strategic plan. In late February, the president called a joint meeting of the academic and faculty leadership (the president's council and the university council) to discuss the results of the survey and begin the process of developing a new strategic plan. The planning group agreed that growth should remain one of the key elements of the future plan and that the academic focus should remain on nursing and healthcare, education, and business and technology. The group also agreed that the future plan should emphasize student success, accessibility of education, graduation rates, affordability of education, and career success.

In both USU's self-study, the new strategic planning materials, and most discussions with the team about the future, an emphasis was placed on introducing doctoral programs to USU's program portfolio. This will be a new degree level for USU and will require USU to consider the significant differences between masters and doctoral education. As USU moves in this direction, the team encourages USU to give careful thought to what is needed to support doctoral programs. The team recommends that USU develop a culture and infrastructure to support student and faculty success at the doctoral degree level. (CFRs 2.2b, 2.8, 4.6)

In recent years, USU substantially expanded its program portfolio by adding five undergraduate degrees outside the nursing discipline (BA in Education (added in 2021), BS Health Services, BA in Liberal Studies, BA in Management, and BS in Technology). USU's self-study indicates that program enrollments for the undergraduate programs outside of nursing significantly decreased from a total of 51 students in 2016 to only 32 in 2020. As a result, some classes have only one student, with most having fewer than five.

Leadership was able to provide a clear mission-related rationale for the addition of the BA in Education in 2021 given changes in teacher credentialing regulations that will enable its

graduates to enter the teacher workforce. However, USU recognizes it has work to do in determining the role of undergraduate programs at USU, recognizing in its self-study that "less is known about the meaning, quality, and integrity of undergraduate degree programs at USU." This became more apparent to the team after discussions with university leadership, faculty and students.

The undergraduate students with whom the team spoke were very appreciative of the ability to continue their coursework without the fear of a class being canceled even though this resulted in having classes alone or with only one or two other students. Those with whom the team spoke voiced a preference for having classes with more students. At least one undergraduate program review reflected the opinion that the program is not viable due to its small size.

The team recommends that USU engage in financial analyses of programs as well as disaggregation of student assessment data as part of its strategic planning and program review processes to better understand a program's viability and sustainability. (CFRs 3.4, 4.6)

The team further recommends that USU continue to work on a mission-driven strategic plan for the future that reflects careful thought about the role of each current and planned program in furthering the USU mission in a competitive and changing higher education landscape. (CFRs 1.1, 4.6, 4.7)

As Covid emerged, USU was deft in quickly shifting to address the sudden challenges presented by the pandemic. The institution was able to move to ensure students' education and training experiences were uninterrupted and kept in close contact with students, faculty, and staff. USU is now reflecting on lessons learned as it looks to the future. (CFR 4.7).

<u>Conclusion</u>

The team's finding, which is subject to Commission review, is that United States University has provided sufficient evidence to demonstrate compliance with Standard 4. Final determination of compliance with the Standards rests with the Commission.

Compliance with Federal Requirements

The team reviewed documents relevant to the institution's compliance with WSCUC Standards and federal requirements. Specifically, the Credit Hour and Program Length review form, the Marketing and Recruitment Review form, the Student Complaints Review form, and the Transfer Policy Review form were completed by the team and are shown in the appendices. USU has published or has policies on student grievances and complaints, refunds, marketing and recruitment, transfer of credit, and credit hour assignment. The institution clearly defines credit hours and accurately identifies the type and meaning of the credit awarded. The team concluded that USU is in compliance with federal requirements.

Component 3: Degree Programs: Meaning, Quality and Integrity of Degrees

<u>Degree Meaning</u>

At present, USU is only enrolling students into its online programs. Distance education students are well-integrated into the life and culture of the institution through the admissions process, during which the counselors determine the appropriateness of fit with both the program and the online learning environment. Once admitted, students receive on-boarding from student advisors and online classrooms include links to student support services. USU also

provides virtual meeting spaces (Teacher's Lounge, Caring Corner) that support informal gatherings, regular faculty-student meetings, and colloquium and other extra-curricular activities.

The meaning ascribed to the USU degree is focused on undergraduate and graduate working professionals seeking career advancement within flexible schedules while optimizing online learning. Each degree program's meaning is based upon the university's mission, intending to embrace the core values of affordability, diversity, inclusiveness, integrity, lifelong learning, and quality. There is a statement on the USU website publicly articulating the meaning of its degrees with an emphasis on the supportive educational environment for all. USU also has nine institutional learning outcomes (ILOs) that specify what students are expected to achieve from a USU degree (e.g., Demonstrate cultural and global awareness as responsible citizens and professionals; Collaborate effectively as members and leaders of diverse teams; Objectively analyze and evaluate issues in order to formulate judgments).

In USU's institutional report it is written, "A key finding during the self-study is that the USU community fully understands the meaning, quality, and integrity of the USU graduate degree programs through the discussed processes and constructs, but less is known about the meaning, quality, and integrity of undergraduate degree programs at USU." The university is currently in planning discussions about when and how it will use the undergraduate degree program constructs and processes to appropriately serve as a scaffold to USU's graduate programs, as well as how master's degree programs scaffold into their doctoral degree programs. By further in-depth review of the metrics of each program, more thought can be applied to how well the institution is ensuring the quality and integrity of each of their degrees, especially as related to their undergraduate student population.

<u>Degree Quality and Integrity</u>

USU has a student-centric culture, and the university invests in substantial resources, report tracking, and interventions for at-risk students as well as data-informed decision-making for program needs. The university uses the Desire to Learn (D2L) platform to which both faculty and students receive training and orientation. There is full-time technology support for D2L, as well as for the supplemental software used by the programs. The university reports that students can reach out to their academic advisors for any technical questions and will be navigated to the appropriate support.

USU's articulation of the meaning, quality, and integrity of degrees does not yet identify the institution's plans for ensuring the quality and integrity of degrees–although these processes clearly exist. Continuous quality improvement in curriculum development, review, and assessment is clearly a priority for the institution, as shared in interviews with faculty and staff as well as articulated in the institutional report. Faculty design the curriculum and courses to ensure consistency with structure, expectations, credit hour requirements, and compliance with institutional and program learning outcomes as well as state guidelines in courses with related licensure examinations. All curriculum and programmatic changes are routed to the faculty senate for final review and approval before implementation. Quality assurance review is also provided by external professional accreditation for several programs.

While USU has articulated the meaning of degrees (including describing aspects of the quality of degrees), the team encourages the institution to clearly define and describe processes for assessing the quality and integrity of degrees within its public MQID statement.

<u>Component 4: Educational Quality: Student learning, core competencies, and standards of performance at graduation</u>

United States University has three colleges: the College of Nursing and Health Sciences, the College of Education, and the College of Business Technology. Each college has multiple programs. The College of Nursing and Health Sciences offers a BS in Health Sciences, a BS in Nursing (RN to BSN), an MS in Nursing, a Post-Master's Graduate Certificate in Emergency Nurse Practitioner, a Post Master's Graduate Certificate in Health Care Leadership, a Post Master's Graduate Certificate in Nurse Educator, and a recently approved Doctorate, Nurse Practitioner (scheduled to launch in May 2022). The College of Education offers a BA in Liberal Studies, an MA in Education, a Graduate Certificate in Early Childhood Education, a Graduate Certificate in Higher Education Administration, a Graduate Certificate in Special Education, and a Teacher Credentialing Preparation Program. Two additional programs (a Bachelor of Education and a Master of Arts in Teaching) were approved by WSCUC and are pending implementation.

The College of Business and Technology offers a BA in Management, a BS in Information Technology, an MBA, and a Graduate Certificate in Business Analytics, a Graduate Certificate in Finance, a Graduate Certificate in Human Resources, a Graduate Certificate in Information Technology, a Graduate Certificate in International Business, a Graduate Certificate in Marketing, and a Graduate Certificate in Project Management.

Based upon prior Commission feedback, the institution engaged in a series of programmatic assessment improvements beginning in 2014, implementing programmatic and curricula changes based upon the results. (CFR 4.1) The team recommends that the institution continue to develop and strengthen its assessment processes, incorporating data from environmental scans of the evolving higher educational landscape as well as ensuring review of

disaggregated data to inform strategic program- and population-based decision-making. (CFRs 4.6, 4.7)

Institutional research activities incorporate data derived from multiple sources, including course evaluations, grades, student formative and summative assessments, demographic variables, academic progress indicators, alumni data, satisfaction rates, clinical placement, and examination scores (e.g., the majority of students of the MSN program chose to sit for the American Academy of Nurse Practitioners (AANP) or American Nurses Credentialing Center (ANCC) to validate their qualifications and knowledge for practice as a family nurse practitioner. (CFRs 4.2, 4.4)

Student learning outcomes are included in academic handbooks, policies, curricula, syllabi, and in course assignment rubrics, and are aligned with advisement, library, and information and technological resources. The institution's bachelor's programs support the development of core competencies including written and oral communication, quantitative reasoning, information literacy, and critical thinking. USU assesses core competencies through analysis of signature assignments. The results of these assessments are used to amend the curricula and pedagogical approaches. Additionally, the BS in Nursing has specialty accreditation through the Commission of Collegiate Nursing Education, which examines students' competencies.

USU's graduate programs establish clearly stated objectives differentiated from and more advanced than undergraduate programs in terms of admissions, curricula, standards of performance, and student learning outcomes. Graduate programs foster students' active engagement with the literature of the field and create a culture that promotes the importance of scholarship and/or professional practice. Ordinarily, a baccalaureate degree is required for

admission to a graduate program.

USU's master's programs have clear admissions criteria, curricula, standards of performance and student learning outcomes. Bachelor's degrees are required for entry into each.

The university plans to launch a Doctorate Nurse Practitioner program in May 2022 and is considering a Doctor in Business Administration and Doctor of Education in the future. The team recommends that USU develop a culture and infrastructure to support student and faculty success at this degree level since it will be new for the institution. (CFR 4.6)

Data are disseminated at the program, school, university, and board of director levels and reviewed by various committees (such as diversity, equity and inclusion [DEI] and retention) to inform initiatives and/or corrective action planning. (CFR 4.2) University leadership reports that institutional as well as program review data will also be used to inform its next strategic planning effort, which will assist in program diversification and profitability analyses. (CFR 4.6)

Program faculty, in concert with a faculty-led assessment team, are responsible for the development, design, and operationalization of student learning outcomes and standards of performance. Faculty ensure that expectations for teaching and learning are socialized to colleagues and faculty through a "lead faculty" mentor model. Students are socialized to these expectations at the time of admissions, during orientation, in their syllabi, through assessment rubrics, and through postings by faculty in the online classroom environment. Assessments of student learning and experiences in the educational environment are used by faculty and student services staff to inform program improvements. (CFRs 4.3, 4.4) Faculty annually engage in formal review of assessment data. (CFR 4.3)

Program development and design includes quantitative feedback from institutional research data as well as qualitative input from university stakeholders including practitioners in the fields in which the program trains its students to practice. (CFR 4.5)

The team concluded that USU is clearly focused on and engaged in the assessment of student learning, the assessment of core competencies, and the assurance of performance standards upon students' graduation.

Component 5: Student Success: Student Learning, Retention, and Graduation

Student Success Structure

There are three types of advising structures at USU along the student journey. First, there is the new-student advising team that works with assigned students during their first couple of courses. A new student orientation provides acculturation and stability. Later, there is a warm hand-off of the student to an academic advisor who will carry the students along their academic journey all the way through to graduation. Academic advisors provide motivation to students and work in collaboration with the faculty. The average caseload for an academic advisor is 300 students per advisor depending on program needs. The third student advising structure is reserved for international students who have a dedicated person under the registrar to make sure international requirements are met.

USU recently created a committee focused on student retention because they saw an opportunity for improvement. This committee is composed of the registrar, program directors, faculty representatives, student advisors, office of field experience, the DEI chair, and the VP of academic and regulatory operations. The committee's charge it to review and provide feedback on the campus strategies for student retention and to assist with the implementation of these

strategies. The committee submits an annual report to the President's Council for circulation to the appropriate governance bodies. The continued student success in programs with small class sizes, as is the case in the undergraduate programs, will be a focus of the retention committee.

Metrics

USU assessment of student success is based on retention, graduation, grades, persistence, time to completion, placements, and student evaluations. The institution uses IPEDS and College Navigator data as external benchmarks. USU currently lacks internal benchmarks for measuring programmatic retention and graduation rates. The president's council is considering disaggregating the data at the degree level instead of program level with newly established benchmarks for a more granular analysis of success and opportunities.

As noted in USU's institutional report, over the past three years, the USU graduate programs have a graduation rate of 77% representing 95% of all students. The graduation rate for undergraduate students is 58%. USU attributes its success in its graduate nursing programs to the field experience support offered in the MSN-FNP program when students are in their clinical rotations, improved technology, and a focus on early success in students' first two courses with the dedicated new-student advisor.

USU graduate program fall-to-fall retention rates improved from a rate of 71% in 2017 to 73% in 2020. Undergraduate student fall-to-fall retention improved from a rate of 37% in 2017 to 56% in 2020.

Factors Contributing to Success

USU has identified the two key factors that positively impact a student's likelihood to be retained and graduate. The first factor is the early-alert form completed by faculty members on

at-risk students and sent to the academic advisors. This is a proactive measure to prevent further issues. If deemed necessary, a student may be placed on a remediation plan.

The second contributing factor is the new-student orientation. USU conducted a study on the efficacy of its new-student orientation. The institution measured student success based on board pass rates of students in its first class and compared student performance of those who attended new-student orientation with students who did not attend the new-student orientation. USU found that students who attended the new-student orientation had an 88.6% chance of passing the first class versus the non-attenders at 67.4%. USU concluded that the orientation helps students to acculturate, invest in their student journey, and become better acquainted with all their resources.

During the team's interviews, many students shared that USU's student-centric culture contributed to their success. Due to the small class sizes, faculty get to know their students and provide personalized support. Faculty and staff are flexible because they understand students have outside commitments, and students appreciate their caring, attention, and support.

Another service that the university expects will contribute to student success is a planned student mentoring program. This program will match new students with either alumni or students nearing graduation who can assist with advice to help students overcome challenges and deepen the overall student experience.

Should a student have a grievance, there is a process for registering their grievance. The student can file a grievance form that is routed to the provost. The provost forms an appropriately constructed committee to address the grievance. There has been only a small number of grievances to which the university has been responsive.

Co-Curricular Activities

The team was able to identify only one co-curricular program that has been assessed by USU for its effectiveness and impact on student retention and/ or degree completion. USU faculty and staff acknowledged that this is an opportunity for improvement. The team encourages USU to further develop its co-curricular offerings and support as well as developing an assessment mechanism to ensure the sufficiency of co-curricular experiences and associated student support.

Diversity, Equity, and Inclusion

The institution views its plans regarding diversity, equity and inclusion as an area for improvement. The DEI committee is new, established in August 2021 to assess campus climate. USU is currently working on a campus climate survey draft to deploy in the coming months. Although USU has a low response rate on the student satisfaction survey (40%) and the end-of-program surveys (57%), results show high levels of satisfaction with students' overall educational experience at USU with an increase in satisfaction over the past three years of survey deployment. Because the USU population has significantly changed in recent years from nearly 40% international students to almost no international students, the results of the current surveys will be very helpful as the committee determines the best next steps to ensure USU is creating the community environment it seeks.

Commitment to Student Success

USU's mission to serve underserved populations fosters a good sense of teamwork and mutual support across the institution. This was exemplified by the way in which the institution pivoted during the COVID-19 pandemic in order to meet student education and training needs,

particularly given the number of students placed by the the Office of Field Experience (OFE) at clinical sites, many of which were closing. USU leveraged simulation resources, maintained close communication with regulators and accreditors and held frequent town hall meetings to both inform and to solicit feedback and input. USU is to be commended for this nimble response.

USU's commitment to student success has enabled the institution to offer students the flexibility of study in programs with high relevance to career paths and to create strong support from peers, faculty, and staff.

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

Continuous quality improvement at USU is based on the assessment of student learning, the program review process, and the university's data collection and analyses. Processes are currently being developed to procure more meaningful assessment data to inform decision-making at USU.

Assessment of Student Learning

USU faculty utilize both formative and summative assessment and include both direct and indirect forms of assessment. The assessment of student learning outcomes at USU consists of faculty using analytic assessment rubrics that are designed to assess specific student learning outcomes using student work from signature assignments that are embedded within courses. Going forward, the university is developing a "signature assignment" for each course.

Students learn about summative assessments for each course within the learning management system. Course learning outcomes (CLOs) are aligned with program learning

outcomes (PLOs) as well as institutional learning outcomes (ILOs). Assessment of PLOs occurs at designated points within the curriculum, following the university's assessment plan.

USU utilizes an assessment and curriculum committee within each college to conduct program learning outcomes (PLO) assessments for each program. This assessment of program learning outcomes, following the assessment plan, begins with a training for faculty raters that includes a focus on assessment tools (analytic rubrics) and the calibration of raters ahead of the assessment. Samples of de-identified student work are assessed by a faculty team, and results are analyzed for potential planning for quality improvement. All program learning outcomes are reviewed within a five-year cycle, according to the learning outcomes assessment schedule.

The assessment and curriculum committees share assessment results with the faculty senate, the university council, and the president's council. This flow of information allows for appropriate involvement of faculty in ownership of the curriculum. It also as informs USU's administration about assessment results needed for higher-level decision-making and for potential budgeting decisions and prioritization. Although the university is in the early stages of building a fully comprehensive assessment process, faculty take ownership of the assessment process and are able to clearly and enthusiastically articulate their assessment activities (which includes examples of the direct assessment of student learning), their plans for further development of the assessment process, and timelines. Faculty note changes in course and subject sequencing changes as well as changes to assignments based on the results of assessing student learning.

USU is currently automating the reporting of assessment results so that data compilation will no longer be a cumbersome process. USU's institutional research staff, who work for AGI, are assisting in this automation that will include the use of assessment software.

USU has experienced some improvements in learning in recent years, as evidenced by increased national board exam pass rates. USU's largest program, MSN-FNP, has seen pass rates for the national certifying board exam (AANP) increase over the past three years, from 79% to 82%.

Data, Technology, and Institutional Research

USU's provost is currently building the institution's capacity for data collection and analyses as well as using technology to maximize student success. For example, academic advisors now utilize a proprietary student information system to ensure satisfactory academic progress of students by monitoring student program progression, participation, and attendance. The process of building USU's data collection and usage capacity includes the scheduling of data summits that include a cross-functional review of student learning and success metrics that inform student success initiatives.

USU has recently increased its focus on automation in the collection and application of data to maximize technology and reduce reliance on manual compilation and calculation. Tableau is already being utilized by various groups across the university to further monitor program enrollment, student success, academic progress, and other key data points utilized for decision making. Through the automation process that has been started and the data visualization efforts that have already been undertaken, USU leadership is able to access program learning outcomes and student success reports in Tableau and is able to view "real-time" data to help them with critical and timely decision-making within their programs.

Institutional research plays a key role in monitoring student success and conducting program reviews. As part of the program review process, institutional research provides colleges with student data (end-of-course and end-of-program surveys, student satisfaction survey,

alumni surveys, enrollment patterns, and persistence, retention and graduation data broken down by demographic categories). Assessment reports and statistical data summaries are utilized in the program review process.

Colleges are beginning to use internal and external data to support curricula and program changes. For instance, the College of Business and Technology made changes as a result of data analysis from the program review process, including discontinuing specializations that had no enrollment, lowering the number of required course credits, and reducing the number of term starts to six per year rather than twelve to increase class sizes.

Program Review

USU's program review process is another important quality improvement process at USU. The university is currently evaluating its nursing program. In the past several years, USU has reviewed the following programs: BS in Health Sciences (2020) and MA in Education (2018). The institution has yet to review the BA in Management, the MBA, the BA in Nursing, the Teacher Credentialing preparation program, and the general education program, per the program review schedule. The Aspen Group's IR staff regularly provide student data to each program for the program reviews.

USU's faculty have primary responsibility for assessing program quality, with support from the administration. A program review manual provides an overview of the process as well as specific guidelines regarding process components. Procedures for conducting the annual PLO assessment are published in the learning outcome assessment principles and processes handbook. For each designated program review, a program review committee is assigned by the provost and dean, and external reviewers are chosen by the provost via faculty nomination and college advisory board members.

Program review data include data for the past five years including enrollment and retention data, alumni and student satisfaction survey results, average class size, financial and budget information, and benchmarking with other schools.

Results of the program review are presented to the college curriculum committee for review, to the college as a whole, and to the university council and president's council for further consideration and development of action plans for improvement. USU's 2018 Master of Arts in Education (MAEd) program review resulted in the following improvement plans, which have yet to be reassessed but which have been implemented per plans: enrollment management through offering fewer start dates, increased marketing and recruitment efforts, the combining of the MAEd and the Teacher Credentialing Preparation Program (TCPP) into one program of study, the discontinuation of certain specializations with low student enrollment, and the creation of new specializations that are in demand in the field of education.

USU has made changes to expectations for learning based on the program review process. For instance, based on lower-than-desired student performance for the learning outcomes of patient assessment and treatment planning, faculty clarified expectations for student learning that are assessed through SOAP (Subjective-Objective-Assessment-Plan) notes.

Thus far, program reviews have helped the faculty to understand the need to revisit the curriculum, adding content and changing course sequencing as noted by members of the assessment and curriculum committees. The team recommends that USU further develop and enhance its program review process such that the university can use the reviews to thoroughly assess program viability and sustainability as well as to inform the university of student support

needs. (CFRs 2.7, 4.1)

The team encourages USU to add data that will be meaningful to the university at this stage of its growth including learning outcomes that are disaggregated and co-curricular and support service data. The team encourages USU to conduct deeper financial and environmental analyses and use these results to help make critical decisions regarding long-term program viability and sustainability. Finally, based on the results of the recent program reviews conducted, the team encourages USU to make changes to their process, as appropriate, to improve the quality and implementation of the program review/learning assessment process.

Conclusion

USU's processes for assessing student learning and student learning outcomes is currently being enhanced and is increasingly becoming more meaningful and more systematic. Going forward all courses will now include a summative assignment and assessment that is designed to assess the student learning outcomes. Faculty are starting to be trained in assessment, including emphasis on the validation of assessment tools and the calibration of faculty raters. Faculty can talk cogently about the assessment efforts that are underway.

The program review process has received an overhaul due to the creation of a new program review handbook, which outlines a process built on good practices. While the institution appears to be somewhat behind in terms of implementing program reviews, the reviews being conducted have been based on the new process and required components. Faculty can specifiy changes that need to be made to assignments and assessments, and the university can identify additional needs for certain types of data to help make critical decisions regarding program viability and sustainability.

In addition to the recent planning for increased automation of data collection and

reporting, USU has identified goals to provide additional training and support for faculty, enhance tracking of students who need additional support, identify curriculum revision and material updating, and research additional specializations or certificates that may be valuable.

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

USU has received unqualified opinions on its recent audits and has shown improvement in financial strength since the acquisition by AGI due to the growth in the student body. USU's composite score went from 1.8 in FY19 to 3.0 in FY21. The institution's student body has grown from 247 students in fall 2016 to 2,629 in spring 2021. USU has continued to invest in additional resources to support the student growth and should continue to make proactive plans to use the results of program reviews to increase the types of resources as well as number of resources to support the continued growth and success of the student population. The institution's management and the USU board both emphasized a focus on smart growth for the institution.

USU's positioning as a predominantly online university and its leadership's nimbleness allowed for a quick reaction to COVID-19 pandemic and agility to continue to service its students. The institution has been approved by WSCUC for a change of location and is waiting approval from the US Department of Education to move its headquarters from San Diego, California, to Phoenix, Arizona, in order to align more closely with AGI's support personnel and to take advantage of the National Council for State Authorization Reciprocity Agreements (NC-SARA). (California is the only state that does not participate in NC-SARA.) USU believes this potential relocation to Arizona is in the long-term financial best interest of the university.

USU's unique monthly payment plan has provided a differentiated financing approach for

students which students truly appreciate in making education affordable. This monthly payment plan is currently a key differentiator in the marketplace.

USU's budgeting process has provided a high level of transparency and visibility for each functional area of the institution. Resource allocation is managed through ratio-based calculations as well as active involvement from the president and provost to evaluate needs. The new CFO is currently developing more granular reporting, including a focus on all the components of the enrollment model, not just new students. The board approves the annual budget. The finance committee receives quarterly reports that show budget to actual performance for new students and key income statement line items.

USU's relationship with AGI allows USU to obtain quality services with greater scale than they could do on their own. The collaborative relationship between USU and AGI management creates a strong working relationship to ensure success.

USU is currently working on a new strategic plan for fiscal 2022-2025. USU is faced with key questions, including the role of undergraduate programs in its portfolio as well as how to support future doctoral programs. The education marketplace is rapidly changing with more providers at the online graduate level. The team encourages USU to continue to assess the global and national higher education market to determine which changes will affect the institution most strongly in the next seven to ten years and develop long-term plans (CFRs 4.6, 4.7). USU is currently dependent on primarily one program and greater program diversification as well as diversification in sources of revenue will assist in long-term financial sustainability.

The team recommends that USU support its strategic planning with robust financial analyses, such as the disaggregation of student population data (i.e. new students, continuing students, attrition) and analyses at a program level to understand diversification and

profitability. (CFRs 3.4, 4.6)

Component 9: Reflection and plans for improvement

During the self-study process, USU engaged multiple constituencies within the university

community in examining itself in the context of the accreditation standards and its strategic

planning with an eye to the evolving higher education landscape. USU constituents were self-

reflective and honest in identifying areas of strength and areas needing improvement. Through

USU's new strategic planning efforts, the institution has already begun to address opportunities

to improve.

SECTION III – COMMENDATIONS AND RECOMMENDATIONS

The team commends:

1. The USU faculty and staff for their deeply held commitment and dedication to student
    learning and success, their mission-driven ethos, and for fostering a widespread
    respectful and caring culture.

2. USU's leadership team for its passion for the USU mission and its commitment,
    energy, and clarity of purpose in creating a highly collegial and collaborative culture
    focused on student learning and success.

3. The USU board of trustees for its high level of engagement; its thoughtful and
    experienced approach to addressing its responsibilities; its focus on the importance of
    diversity, equity and inclusion at organizational levels; and its overall passion and
    commitment to the mission of USU.

4. USU for embracing the challenge of working with AGI and succeeding in establishing

a highly collaborative relationship that maximizes USUs benefits from AGI's resources such as marketing, access to greater technology and institutional research, thus allowing USU to grow its enrollment.

5. USU's financial situation, which has improved significantly -- from deficits in 2015 to enrollment growth beginning in 2018-- resulting in budget surpluses and improvement in composite score from 1.8 in FY19 to 3.0 in FY21.

6. The innovative Office of Field Experience (OFE), with its laser focus on clinical experience. Matching student interest and expectations with appropriate and practical field experiences extends the USU campus culture, fosters greater student engagement and retention.

7. USU for the agility and resilience that it exhibited in responding to the COVID-19 pandemic, including its immediate shift to remote learning, its consistent contact with regulatory agencies and professional accreditors to ensure students' education and training experiences were uninterrupted, its continuous outreach to students, faculty, and staff to maintain a community environment, and its consideration of ways to leverage lessons learned to benefit future educational delivery models.

The team recommends that USU:

1. Continue to work on a mission-driven strategic plan that reflects careful thought about the role of each current and planned program in furthering the USU mission in a competitive and changing higher education landscape. (CFRs 1.1, 4.6, 4.7)

2. Support strategic planning with robust financial analyses that disaggregate data by student population (i.e. new students, continuing students, attrition) and by type of

program to better understand profitability and institutional needs. (CFRs 3.4, 4.6)

3. Continue to work with USU's financial aid service provider to ensure appropriate

financial aid policies and compliance with Title IV requirements in light of recurring

financial aid audit findings. (CFR 1.7, Title IV Compliance Policy)

4. Acquire knowledge of co-curricular services and programs in online environments that

address the needs of all students and support their personal and professional development

in meaningful ways. Develop a more holistic and comprehensive model for academic and

student support services that is regularly assessed. (CFRs 2.11, 2.13)

5. Continue to develop and strengthen assessment and program review processes and use the

results to inform decisions regarding program viability, sustainability, improvement, and

planning for growth. (CFRs 2.7, 4.1)

6. Develop a culture and infrastructure to support student and faculty success at the doctoral

degree level (CFRs 2.2b, 2.8, 4.6)

APPENDICES: Federal Compliance Forms

CREDIT HOUR AND PROGRAM LENGTH REVIEW FORM

Material Reviewed	Questions/Comments (Please enter findings and recommendations in the Comments sections as appropriate.)
Policy on credit hour	Is this policy easily accessible? X YES ❑ NO
	Where is the policy located? Credit Hour Policy (on University Website)
	Comments:
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)? X YES ❑ NO
	If so, does the institution adhere to this procedure? X YES ❑ NO
	Comments:
Schedule of on-ground courses showing when they meet	Does this schedule show that on-ground courses meet for the prescribed number of hours? X YES ❑ NO
	Comments:
Sample syllabi or equivalent for online and hybrid courses *Please review at least 1 - 2 from each degree level.*	How many syllabi were reviewed? 3
	What kind of courses (online or hybrid or both)? Both
	What degree level(s)? X BA/BS AND Master's
	What discipline(s)? Biology, Education, and Nurse Practitioner
	Does this material show that students are doing the equivalent amount of work to the prescribed hours to warrant the credit awarded? X YES ❑ NO
	Comments: Curriculum Development Handbook, pgs. 13-16
Sample syllabi or equivalent for other kinds of courses that do not meet for the prescribed hours (e.g., internships, labs, clinical, independent study, accelerated) *Please review at least 1 - 2 from each degree level.*	How many syllabi were reviewed? 3
	What kinds of courses? hybrid
	What degree level(s)? X BA/BS X Master's
	What discipline(s)? Nursing
	Does this material show that students are doing the equivalent amount of work to the prescribed hours to warrant the credit awarded? X YES ❑ NO
	Comments: Online Course Syllabi Samples in Appendices Table of Contents

Sample program information (catalog,	How many programs were reviewed? 13
	What kinds of programs were reviewed? hybrid, online
website, or other program materials)	What degree level(s)? ❑ AA/AS X BA/BS X Master's ❑ Doctoral
	What disciplines? Education, Business and Technology, and Health Sciences
	Does this material show that the programs offered at the institution are of a generally acceptable length? X YES ❑ NO
	Comments: Program Details in Catalog

Review Completed By: Karen McClendon
Date: March 10, 2022

MARKETING AND RECRUITMENT REVIEW FORM

Under federal regulation*, WSCUC is required to demonstrate that it monitors the institution's recruiting and admissions practices.

Material Reviewed	Questions and Comments: Please enter findings and recommendations in the comment section of this table as appropriate.
**Federal regulations	Does the institution follow federal regulations on recruiting students? X YES or NO Employee Handbook
	Comments:
Degree completion and cost	Does the institution provide information about the typical length of time to degree? X YES ☐ NO COB Programs, COE Programs, CONHS Programs
	Does the institution provide information about the overall cost of the degree? X **YES** ☐ **NO** Tuition and Fees Webpage, Subhead: Estimated Program Charges
	Comments:
Careers and employment	Does the institution provide information about the kinds of jobs for which its graduates are qualified, as applicable? X **YES** ☐ NO Jobs List by Program
	Does the institution provide information about the employment of its graduates, as applicable? X **YES** ☐ NO BPPE Annual Report, School Performance Fact Sheet
	Comments:

*§602.16(a)(1)(vii)

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

Review Completed By: Karen McClendon
Date: March 10, 2022

STUDENT COMPLAINTS REVIEW FORM

Under federal regulation*, WSCUC is required to demonstrate that it monitors the institution's student complaints policies, procedures, and records.

Material Reviewed	Questions/Comments (Please enter findings and recommendations in the comment section of this column as appropriate.)
Policy on student complaints	Does the institution have a policy or formal procedure for student complaints? X YES ❑ NO
	If so, is the policy or procedure easily accessible? Is so, where? ? <u>Complaints, Grievances, and Appeals Policy</u>, Student Handbook
	Comments:
Process(es)/ procedure	Does the institution have a procedure for addressing student complaints? X **YES** ❑ NO If so, please describe briefly: <u>Complaints, Grievances, and Appeals Procedure</u> A student must submit the grievance in writing to the provost, who will review the grievance within five (5) working days, requesting additional information from the grievant if necessary. The provost will appoint a grievance committee that includes at least two faculty members not from the student's program and one administrator (not director/dean) of the student's program, the provost, or the president. The committee has ten working days from receipt of the grievance to review it, obtain further information as needed, and make a determination as to grievance resolution, providing its recommendation to the provost.The provost has three working days to provide the University's response to the grievant.
	If so, does the institution adhere to this procedure? X YES ❑ NO
	Comments:
Records	Does the institution maintain records of student complaints? X YES ❑ NO If so, where? The academic Dean maintains the record of student complaints.
	Does the institution have an effective way of tracking and monitoring student complaints over time? X YES ❑ NO
	Comments:

*§602-16(1)(1)(ix)

See also WASC Senior College and University Commission's Complaints and Third Party Comment Policy.

Review Completed By: Karen McClendon
Date: March 10, 2022

TRANSFER CREDIT POLICY REVIEW FORM

Under federal regulations*, WSCUC is required to demonstrate that it monitors the institution's recruiting and admissions practices accordingly.

Material Reviewed	Questions/Comments (Please enter findings and recommendations in the comment section of this column as appropriate.)
Transfer Credit Policy(s)	Does the institution have a policy or formal procedure for receiving transfer credit? X **YES** ❐ NO
	Does the institution have a policy or formal procedure for receiving transfer credit? X YES or NO Transfer Credit Policy on University Website
	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? X **YES** ❐ NO
	Comments: Yes, the criteria are referenced.

*§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 WASC Senior College and University Commission's Transfer of Credit Policy.

Review Completed By: Karen McClendon
Date: March 10, 2022

DISTANCE EDUCATION REVIEW

Institution: United States University
Type of Visit: Virtual
Name of reviewer/s: Diana M. Concannon, PsyD
Date/s of review: November 17, 2021

A completed copy of this form should be appended to the team report for all comprehensive visits to institutions that offer distance education programs1 and for other visits as applicable. Teams can use the institutional report to begin their investigation, then, use the visit to confirm claims and further surface possible concerns. Teams are not required to include a narrative about this in the team report but may include recommendations, as appropriate, in the Findings and Recommendations section of the team report. (If the institution offers only online courses, the team may use this form for reference but need not submit it as the team report is expected to cover distance education in depth in the body of the report.)

Programs and courses reviewed (please list)

Master's of Arts, Education
-MAE512: Assessment in Education
-MAE505: Trends and Issues in Education
-MAE506: Cultural Perspective in Education
Master's of Science, Nursing
-NUR375: Inter-Professional Communication And Collaboration For Improving
Healthcare Outcomes
-NUR378: Global and Community-based Nursing
-NUR499: Capstone: Evidence Based Professional Nursing Practice

How is peer socialization supported? How is faculty engagement supported?
How is faculty engagement tracked?

The University utilizes a multi-faceted approach to supporting peer socialization. In addition to discussion posts and group assignments within the courses, the University has extracurricular opportunities for socialization via an online "Teacher's Lounge" and "Caring Corner"—virtual spaces in which students can interact. There are also colloquium and monthly diversity, equity, and inclusion meetings. The latter provide opportunities for faculty and students to join and explore best practices professional toolkits and other resources related to DEI efforts.

Faculty engagement is supported through "flexible but structured" course designs that set expectations for both response time and depth of feedback. Teaching faculty are paired with a faculty lead – a core subject matter expert – who monitors data secured from the D2L system related to time in course, and samples course posts. Any faculty member found to be below standard in terms of quantitative or qualitative standards of engagement is "coached up" through mentorship by the lead faculty member. All faculty are supported in

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professional development through monthly faculty meetings during which asynchronous trainings on topics such as how to support student writing are offered.   The Institution also offers CMEs every other month and a quarterly faculty pedagogy series.

Background Information (number of programs offered by distance education; degree levels; FTE enrollment in distance education courses/programs; history of offering distance education; percentage growth in distance education offerings and enrollment; platform, formats, and/or delivery method)

According to the University's Institutional Report, the Institution offers seven online bachelors and masters programs. During the virtual review, the Institution clarified that has ceased to enroll students into its on-ground programs, and has begun to diversify and strengthen its online programs. Specifically, it has restructured and re-launched its online Teaching Credential and International MBA program, which currently have 75 and 25 students, respectively. They are also awaiting approval for a Doctoral Nursing Program, for which alumni of their MNP have expressed interest.

Programs are offered in 8-week terms through the Distance 2 Learn platform. The courses are asynchronous and delivered in a "flexible but structured" format. Co-curricula services, such as library services and Brainfuse tutoring services, are embedded in the courses. Specialty learning platforms Picmonic and Osmosis were introduced in Spring 2021 to support students in the Master's of Science Nursing Program increase performance on standardized exams. According to the School Dean, preliminary data indicates that these platforms are supporting student success.

Nature of the review (material examined and persons/committees interviewed)

United States University, Institutional Report for Reaffirmation
Steven A. Stargardter (President)
Scott Burrus (Provost)
Jennifer Billingsley (Dean, Nursing)
Rebecca Wardlow (Dean, Education)
Brigit Fowler (Director of Academic Services)

Observations and Findings

Lines of Inquiry (refer to relevant CFRs to assure comprehensive consideration)	Observations and Findings	Follow-up Required (identify the issues)
Fit with Mission. 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?	United States University has determined that it's most frequent student is a 40+-year-old Black female seeking a career change. It views its online portfolio of professional degrees as instrumental to providing accessible degrees (an explicit aspect of its mission) to its target student population. Programs are initiated at the school/faculty level, approved by leadership, and funded through the annual budget process.	
Connection to the Institution. How are distance education students integrated into the life and culture of the institution?	At present, the University is only enrolling students into its online programs. Distance education students are integrated into the life and culture of the institution through the admissions process (during which the counselors determine "goodness of fit" with both the program and the online learning environment), through the on-boarding with student advisors, through the online classroom (which includes links to student support services), through virtual meeting spaces (Teacher's Lounge, Caring Corner) which support informal gatherings, through faculty-student meetings, and through colloquium and other extra-curricular meetings.	
Quality of the DE Infrastructure. Are the learning platform and academic infrastructure of the site conducive to learning and interaction between faculty and students and among students? Is the technology adequately supported? Are there back-ups?	The University uses the Distance to Learn platform to which both faculty and students receive training and orientation and faculty receive job aids. There is full-time technology support for D2L, as well as for the supplemental software used by the programs (such as Osmosis and Picmonic). The University reports that students can reach out to their Advisors for any technical questions and be navigated to the appropriate support.	

Student Support Services: 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?	Embedded within the courses are Turnitin, a link to the Virtual Library, and a link to Brainfuse Tutoring. According to its Institutional Report and confirmed during the virtual visit, "USU's Academic Support Services are designed to promote and maintain student success. The Student Services Department consists of Academic and International Student Advisors. Student Services works with every student to orient them to the university and to help them understand academic and non-academic policies and procedures. Among other services, Academic Advisors assist students in developing and accomplishing academic goals, utilizing and accessing student success resources, and assisting with faculty outreach, registration questions, and access to tutoring services."	Any evaluations related to this?
Faculty. 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?	Courses are taught by both full and part-time, core and adjunct faculty. Core faculty serve as the "lead" subject matter experts and are responsible for "quality controlling" the development and delivery of courses. There are expectations for faculty engagement in the on-line classroom that are articulated to faculty and there is structured template to guide course development and the linking of course learning outcomes to PLOs and ILOs. There is also design against credit hour calculations, which are then audited after course launch. Feedback is reviewed from teaching faculty after the initial course offering and the course is automatically placed on a revision schedule for future updates (although interim updates can also be incorporated). Prior to launch, the course is QA'd for grammar, etc. by instructional designers. Faculty meet weekly to evaluate data on student outcomes and faculty outcomes. There are also	

	quarterly faculty pedagogy speakers' series and monthly meetings to discuss best practices and to support faculty development.	
Curriculum and Delivery. 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.)	Faculty design the curriculum and courses. The core faculty lead subject matter expert supervises course development (if not designing the course directly) to ensure consistency with structure, expectations, credit hour requirements, and compliance with PLOs/ILOs. There has not been a comparison between online/on-ground. Programs are not comparable.	Credit hour report?
Student Learning. 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?	Assessment is based on retention, graduation, grades, persistence, time to completion, placements, evaluations.	
Contracts with Vendors. 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 Contracts with Unaccredited Organizations?	N/A.	
Quality Assurance Processes: 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?	External professional accreditation for several programs, student feedback, faculty feedback.	Is there alumni data with employment stats?