

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

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

TABLE OF CONTENTS

SECTION I - OVERVIEW AND CONTEXT

- A. Description of the Institution and its Accreditation History, as Relevantp. 4
- B. Description of Team’s Review Process.....p. 6
- C. Institution’s Reaccreditation Report and Update: Quality and Rigor
of the Report and Supporting Evidence..... p. 7

SECTION II - EVALUATION OF INSTITUTIONAL ESSAYS

- A. Component 1: Response to Previous Commission Actions.....p. 7
- B. Component 2: Compliance with the Standards and Federal Requirements.....p. 10
- C. Component 3: Degree Programs: Meaning, Quality and Integrity of Degrees...p. 18
- D. Component 4: Educational Quality: Student Learning, Core Competencies,
and Standards of Performance at Graduation.....p. 21
- E. Component 5: Student Success: Student Learning, Retention, and Graduation...p. 24
- F. Component 6: Quality Assurance and Improvement: Program Review,
Assessment, Use of Data and Evidence..... p. 27
- G. Component 7: Sustainability: Financial Viability, Preparing for the Changing
Higher Education Environment..... p. 32
- H. Component 8: Optional Essay on Institution-specific Themes..... p. 34
- I. Component 9: Reflection and Plans for Improvement.....p. 35

SECTION III - FINDINGS, COMMENDATIONS, AND RECOMMENDATIONS FROM THE TEAM REVIEW..... p. 37

APPENDICES

- A. Federal Compliance Forms
 - 1. Credit Hour Review..... p.41

- 2. Marketing and Recruitment Review..... p. 43
- 3. Student Complaints Review..... p. 44
- 4. Transfer Policy Review..... p. 45

- B. Modesto Campus.....p. 46
- Arcadia Program..... p. 48

SECTION I- OVERVIEW AND CONTEXT

A. Description of the Institution and its Accreditation History, as Relevant

Humphreys University dates its foundation to 1896 when John R. Humphreys, Sr. consolidated academic leadership of the existing Stockton Business College, Normal School, and Telegraphic Institute. It was the first institution of higher education in the city of Stockton. John R. Humphreys Jr. became president of the institution in 1937 and the institution was renamed Humphreys College in 1947. Robert G. Humphreys, Sr. became president in 1980, and Robert G. Humphreys, Jr. assumed the presidency in 2014, marking a continuous leadership of four generations of Humphrey family members. In the fall of 2017, the Board of Trustees authorized the renaming of the institution to Humphreys University, reflecting its broader range of educational offerings. While its main, and historical campus is in Stockton, it has also operated a Modesto branch campus since 1987, and a completion program for a B.S. in business administration in a location called the Arcadia campus. The California State Bar first accredited the Drivon School of Law, the most notable component of the University, in 1983. Since 1992, the University has been accredited by the Western Association of Schools and Colleges Senior College and University Commission.

Total University enrollment has fallen from a high of 1,100 in 2012 to 375 in 2021. Over the last five years, enrollment has declined by 22% (108 students) and between 2020 and 2021 enrollment declined by 12% (53 students). This is significant because even as Humphreys made efforts to add new programs, they have continued to have fewer students.

The University offers undergraduate degree programs (B.A. and A.A.) in eight majors, four Masters of Arts (M.A.) programs, and a J.D. degree program through its law school. These are designed to lead to career opportunities principally in the Stockton region. The typical

Humphrey's student is a working female (77%), caregiver, in a low-income household. The ethnic diversity of the student body reflects the diversity of the San Joaquin Valley and surrounding area (65 % minorities).

The current Mission, Philosophy, and Vision of the University states that:

Mission: "We prepare students for meaningful careers and professions through a high-quality educational experience, strongly informed by the liberal arts, and directed to the specific and changing needs of students from diverse ethnic, cultural, economic, and educational backgrounds."

Philosophy: "Our reason for being is to provide effective instruction and related learning experiences to students. We view ourselves primarily as a teaching institution. Our founder believed that a practical educational program must: meet the educational needs of the individual student and contain elements of general and professional education. We have maintained this simple philosophy throughout our 100+ year service to our Northern California community."

Vision: "We want to be the community-recognized institution of choice, known for providing quality, student-focused, career-oriented, and affordable higher education that improves the lives of students and develops informed citizens."

These statements clearly defines what makes Humphreys unique as an institution, clearly framing its educational goals framed by a dedication to diversity, improving the lives of its students, and by doing so, contributing to the character of the immediate community (CFRs 1.1, 1.4).

B. Description of the Team's Review Process

The team's process for gathering information in preparation for the Offsite Review (OSR) included the review of materials submitted by the institution including (but not limited to) the institutional report and appendices, previous visiting team reports, and Commission Action Letters. The team conference call on February 7, 2020 discussed the current context of the university and the issues raised and identified in these documents. The conference call was generally unremarkable, but the team did decide that separate visits should be made to the Modesto and the Arcadia centers. During the OSR (March 4-5, 2020) the team identified lines of inquiry that built upon the issues raised in previous WSCUC reports, action letters, and institutional responses and review documents. It determined that a major focus of the Accreditation Visit (AV) would be, among other things, enrollment and revenue sustainability and the nature of strategic decision-making and planning across the institution. The team also finalized which documents it would require based on the Lines of Inquiry, which were sent to the Humphreys ALO, Dean Jess Bonds.

Then the world changed. With the Covid-19 lockdown and subsequent prolonged pandemic all normal review procedures were upended. The timeline for the Accreditation Visit (AV) review was changed from spring 2021 to fall 2021 (sixteen months later). At this time, it was planned that the AV would take place in-person at Humphrey University in Stockton CA on October 20-22, 2021. However, on August 26, 2021, because of the continuing pandemic, this in-person AV was changed to a completely remote visit. The Team then determined that it would be better prepared, having seen new material submitted by Dean Bonds if the remote AV could be scheduled for December 2021, and Humphreys agreed. Finally, the remote AV took place from December 8-10, 2021.

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

The self-review conducted by Humphreys University coincided with the development of its 2019-2024 Strategic Plan (this plan was revised prior to the visit). The largely descriptive report was written and assembled by a five-person team that included the president, three deans, and one professor. The same five-person team were the only ones to participate in the Review under WSCUC Standards with only the most common rating on each item reported (CFR 1.8). Up-to-date financial and enrollment documents were ultimately made available to the team upon request but were not part of the initial reports.

During the visit the team was surprised by a number of things not included in the self-review including: new programs (e.g., a technology certificate and an international MBA), the liquidation of the undergraduate library, and a contract with a Vietnamese university to offer the fourth year of an undergraduate program in business on site in Vietnam (CFR 1.8). A lack of candor and transparency was experienced in the report and the visit (CFRs 1.7; 1.8).

SECTION II – EVALUATION OF INSTITUTIONAL ESSAYS

A. Component 1: Response to Previous Commission actions

The self-review indicated that the university had addressed all of the issues from the previous accreditation visit that concluded in 2013. The team, however, saw a number of areas that needed continued attention.

- (1) **Faculty workload.** The previous team had noted that Humphreys had a dedicated faculty but that the workload was heavy and left little time for scholarship. The university was advised that it needed to make sure to attend to its human resources. The report notes that since the last visit, enrollment has declined by over 50% and contends that the smaller class sizes take care of the workload concerns. However, with 2-4 course preparations each quarter, workload continues to be an issue and does not support faculty scholarship (CFRs 2.8, 2.9). The heavy workload and small enrollments results in some majors having all, or most, courses taught by one faculty member (CRF 3.1).
- (2) **Planning.** The Commission urged Humphreys to develop a new strategic plan to address the impact of the changing educational environment. The interim action letter further indicated that Humphreys needed to analyze the cost of new programs, the impact on workloads, and assessment of educational effectiveness. Humphreys has now completed two strategic plans, but the team found both to be lacking analysis and the most recent one to be lacking in transparency (CFRs 1.7, 3.4). The new strategic plan has implications for the historical mission of the university and therefore for the institution's future. This modification of the mission has not been discussed with or recognized by the constituencies of Humphreys (CFRs 1.2, 4.6). The financial data provided to the team on existing programs, indicated that only the law school covered indirect and direct costs and that few covered even direct costs but this was not discussed in the report or the plan.
- (3) **Law School Assessment.** At the time of the last visit, it was noted that the law school needed to complete an assessment of its learning outcomes and to improve its bar pass rate. Since then, Humphreys has hired a new dean for the law school, brought the five-year average bar passage rate over 50%, and moved forward with assessment. However,

program reviews throughout the university have fallen behind schedule and educational effectiveness assessment analyses rely heavily on self-report measures (CFRs 2.6, 2.7).

The team was concerned by the infrequency of program reviews and so of opportunities taken to assess student achievement. The team encourages Humphreys to study more deeply the educational objectives as analyzed by direct measures as they differ from those reflected in student self-report (CFRs 1.2).

- (4) **Migration to new software.** Humphreys has completed its migration to the Populi enterprise system although all features of the system are not yet in use. Finance and financial aid have been outsourced and use different systems.
- (5) **Separate CFO.** The Commission noted at the last visit that Humphreys needed to have a chief financial officer whose primary responsibility is to the institution and who is not the CEO. The university has improved its business practices by outsourcing its financial operations. This has significantly improved the timeliness and accuracy of financial reports. As part of the outsourcing of finance, there is a person who has overall responsibility for ensuring the accuracy and completeness of the financial records. However, his contact with the university community is limited to the president and the board. He acknowledged to the team that he functions more as a controller than as a CFO. He reports that he inputs the budget provided by the president and reports actuals to the president and board but is not himself a decision maker or recommender. The processes lack transparency and organizational structures that facilitate and support transparency within the community (CFRs 1.7, 3.8). Decision-making is concentrated within the hands of the president without mechanisms for the open exchange of ideas.

B. Component 2: Review under WASCUC Standards and Compliance with Federal Requirements

Standard One: Defining Institutional Purposes and Ensuring Educational Objectives Institutional Purposes

The mission of the university is described (Self-Study, 1) as providing “career-focused education grounded in the liberal arts” that meets the needs of the Central Valley. This mission appears to be well understood and agreed upon by the faculty and staff. However, the current strategic plan (2019-2024 revised 2021) appears to move away from this mission with its emphasis on industry-recognized certifications, expanding the geographic market, and developing international programs. The team is concerned by plans that seem to implicitly be moving the university from its historic mission without widespread recognition or discussion within the institution (CFR 1.2).

Integrity and Transparency

The student population at Humphreys is quite diverse with no group in the majority on campus. Consistent with its mission, the student population is economically challenged with 83% Pell Grant eligible. Diversity among the faculty is considerably less than among the students, with 11 of the 14 full-time faculty members identifying as white. Similarly, the Board of Trustees evidences little diversity. The university does not have a diversity plan (CFRs 1.4).

As noted in the self-study, there is a lack of transparency about institutional decision making and a lack of input going to, or valued by, the president (p. 13). These concerns appear to be

widely shared by faculty, administrators, and staff who report that they are generally aware of decisions but not necessarily involved in making them. The university budget is created and held by the president. Academic and administrative areas do not have their own budgets nor do they receive financial reports. Accordingly, the deans cannot establish priorities, plan, or make adjustments to programs that require financial investment. Policies are expressed, but it is not always clear as to how, or if, they are implemented. For example, the undergraduate dean and the Arcadia campus director indicated that there was a requirement that transfer students meet all academic requirements but did not agree who evaluated those transcripts or how it was enforced. The murkiness created concerns about a lack of integrity and transparency in operations (CFR 1.7).

The team is deeply concerned with the integrity and transparency of the University and does not believe it is in compliance with Standard One.

Standard Two: Achieving Educational Objectives Through Core Functions

Teaching and Learning

With its educational focus on career preparation grounded in a liberal arts context, “the educational programs” at Humphreys University “are appropriate in content, standards of performance, rigor, and nomenclature for the degree level awarded” (CFR 2.1) This CFR clarifies that programs’ standards, content, etc. must be consistent “regardless of mode of delivery.” Given that much of this review took place during a global pandemic that necessitated a shift to remote delivery and the continuation of teaching in that modality, it was striking during the visit that there was not a clear sense among the Humphreys faculty and staff of the lessons learned from moving programs to this delivery modality.

Additionally, during its visit, the team raised questions about the depth of the commitment to the liberal arts (especially critical inquiry and quantitative reasoning). While there was assent among the faculty and staff that these are crucial aspects of a Humphrey's education, it was not apparent whether the commitment was more aspirational than actual (CFR 2.2a).

It was clear from the visit that the university has "a coherent philosophy, expressive of its mission, which guides the meaning of its degrees and processes that ensure the quality and integrity of its degrees" (CFR 2.2). From students to faculty to staff, the team received a consistent message on how meaningful this mission is. With its new strategic plan, it looks, however, as if the institution might be straying away from its historic mission to serve the educational needs of Stockton and the greater region. The team recommends that leadership carefully consider the trade-offs of a "Humphreys Anywhere" model in which the university will seek to serve student populations outside the region and even beyond California. One of these trade-offs is that attention to the needs of Stockton students might flag in the pursuit of new student populations. It is important to note that the "Humphreys Anywhere" model seems not to have been transparently vetted by the Humphreys community at-large.

The institutional report and discussions with faculty during the visit evidenced a commitment to clearly stating "student learning outcomes and standards of performance . . . at the course, program, and, as appropriate, institutional level" (CFR 2.3). These outcomes are reflected in course syllabi. Moreover, these outcomes are "developed by faculty," and, as was reported by the institution, proposals for new programs and courses are reviewed and approved by the institution's Academic Council (CFR 2.4).

Alumni from various programs and current law students met with team members and indicated that they were actively involved in learning and that they had achieved the outcomes that faculty

established for their learning (CFR 2.5 and 2.6). In addition to this evidence, the team reviewed sample program review documents; however, it did not see that these reviews involved reflection on and plans to address programs' retention and graduation rates (CFR 2.7).

Scholarship and Creative Activity

As acknowledged in the institutional report, “there was moderate agreement (presumably among those who reviewed Standard 2) that the University can do more to support students through co-curricular programming and to support faculty through clear expectations for faculty development and scholarship.” This lukewarm assertion does not mesh with the team’s sense that it is crucial for the institution to promote “appropriate linkages among scholarship, teaching, assessment, student learning, and service” (CFR 2.9). The team finds these linkages to be critical for the institution, if only for the sake of ensuring disciplinary currency and knowledge of advances in faculty’s disciplines and fields. The team encourages the institution to provide faculty with adequate time (which should be reflected in easing some parts of faculty’s teaching workloads), support, and resources to pursue “scholarship, creative activity, and curricular and instructional innovation, and their dissemination appropriate to the institution’s purposes and character” (CFR 2.8).

Student Learning and Success

During its meetings with administrators, faculty, and staff, the team heard that the institution has a well-developed assessment process with regular cycles of assessment of student learning outcomes with the goal of achieving continuous improvement. Yet, those who spoke to the assessment processes were unable to articulate what the disaggregation of data revealed about certain student populations’ success (CFR 2.10). The team recommends a focus on students’

success, or lack thereof, rather than on what the administrators, faculty, and staff do well. Doing well on the latter end does not always translate into student success and into two of its most common outcomes—increased retention and graduation rates.

In two meetings with the staff charged with student support services, it was obvious to the team members that there is a great deal of dedication—among tutors, financial aid counselors, and others—to providing quality services to Humphreys’ students (CFR 2.13 and 2.14). While this focus on the quality and timeliness of support is to be applauded, the university has not established clear connections among student services, co-curricular programming, and academic success. As has been apparent throughout the pandemic, students need to have a sense that all aspects of their wellbeing (financial, mental health, etc.) as well as their academic performance are being sufficiently addressed by educational institutions.

The team believes the University is in compliance with Standard Two.

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

Faculty and Staff

Humphreys, commended for implementing more efficient administrative processes by outsourcing “back-office payroll, accounting and financial aid processing,” successfully decreased staff headcounts. The change reduced costs overall and enabled a narrowed staff focus on “front office” service to students. In addition, implementation of the SIS system, Populi, enables delivery of key academic and student support metrics to institution leadership to enable informed decision making and resource allocation (Self Study Report, p. 42).

Faculty counts also decreased; attributable to retirements and attrition (Self-Study Report p5). Despite declining enrollments (Enrollment Model Current), the number of programs/degrees

offered has not declined. Though student counts within programs have declined, faculty workload has increased. For example, in 2016, 16 undergraduate programs were offered with 23 fulltime and 95 adjunct instructors as compared with the same number of academic programs in 2020 with 15 full time instructors and 70 adjuncts (FT PT Faculty Numbers by Program).

As use of the Populi reports and assessments matures, institutional leaders can review evidence of student success, program effectiveness and prioritize use of Humphreys resources to advance strategic initiatives of quality and sustainability.

Fiscal, Physical and Information Resources

In response to financial operating deficits (Humphreys Audits 2017 -2020) and declining enrollment, Humphreys developed an enrollment strategy and financial model that relies on increases in enrollment that have not been realized to date. No detailed plan was offered as an explanation of the deficits nor was a realistic plan for eliminating future deficits presented (CFR 3.4).

Faculty reductions were achieved by retirements and consolidations of positions rather than based on evidence of a need to adjust resources to optimizing integrity or, continuity of degrees and faculty workload by degree(s) offered and enrollment (CFR s 3.1, 3.2). Humphreys' academic leaders expressed concern that collaborative resource planning is absent but necessary to ensure the sustainability of Humphreys University in the future (Humphreys Review under WSCUC Standards and Compliance with Federal Requirements Worksheet, sections 3.5 - 3.7, CFR 3.5).

There was no evidence presented that demonstrates shared oversight of resources and how resources are allocated to programs and processes based on strategic priorities. Though there

was evidence of program reviews and assessment, there was no evidence that resource allocations were informed by the results of assessments and program reviews (See Components 4 and 6, below).

There was evidence to support agreement among faculty and staff that the information and technology resources are sufficient to support the programs but resources should be made available to all faculty. Physical resources and access to professional development are adequate. It is unclear if the resources align with Humphreys educational objectives and student outcomes. (CFR 3.5)

Humphreys audits consistently result in clean opinions (CFR 3.4). The Board reports that audits and interim financial information is more timely and accurate as compared with prior years. The Board attributes the improvements to the change in financial operations leadership and the new CFO. In contrast, the institutional academic leaders express concern about the change in leadership, changes to the allocation of resources without collaboration or consideration of changes to academic strategies and program delivery. As an example, there are weaknesses that academic leaders recommend focusing on for improvement: "...faculty and staff are in conflict over institutional priorities", "lack of input in decision making affecting faculty governance", "falling enrollment", "conflict and poor communication between faculty and administration" (All Faculty SWOT Analysis Consensus In Service 2019 p. 1). Issues cited appear to be consistent but there is a lack of collaborative effort to resolve the issues (CFRs 3.4, 3.7).

Humphreys' CFO works primarily with the CEO and has no interaction with academic and institutional leaders. Humphreys' CEO communicates budgets and resource allocation

priorities to both the Board and to institution leadership with no evidence of feedback from or collaboration with either group (CFR 3.9).

Humphreys' Board of Directors is comprised of members with varied qualifications. Board effectiveness would be enhanced with a more diverse membership representing both the demographic of the students attending Humphreys and members with higher education expertise. To offer the Board training in the responsibilities of a higher education institution and the opportunity to engage in self-review will enhance the support offered the CEO and Humphreys University leadership. (CFR 3.9).

The team is deeply concerned with the sustainability of the University and does not believe it is in compliance with Standard Three.

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

Quality Assurance Processes

Humphreys University has demonstrated a deep commitment to its students, and the institution's mission and learning outcomes articulate that commitment. However, the offsite review and subsequent site visit indicate that the institution needs to continue to develop quality assurance processes through the systematic use of direct evidence, and that it needs to develop a culture that encourages all stakeholders, including faculty and non-senior administrative staff, to participate fully in the regular assessment of institutional effectiveness (CFRs 4.3, 4.5, 4.6). See also Components 3, 4, and 6). The quality of a degree is only meaningful if it can be measured. Stating that a degree is high quality will do little to attract and retain students or help them to find jobs. Humphreys' ability to articulate what makes a quality degree and what evidence

demonstrates it is the way to make it meaningful. (See Component 3 for more on quality, Components 4 and 6 for evidence to support quality of degrees.)

In order to ensure that program quality is maintained, resource allocation and academic planning need to be aligned (See Component 7). A review of financial documents and conversations with leadership demonstrated little past connection between financial planning and academic planning (CFR 4.6).

Institutional Learning and Improvement

Humphreys has made great strides with regards to Program Review. There are well-developed reports, policies, sample documents, and guidelines (See Program Review Process). They have used Moodle to house assessment and program review reports and data for faculty and staff to review. This all shows an incredible amount of time and effort on the part of the institution. However, a review of the different program review calendars shows large gaps in the past seven years in actual program reviews completed. Additionally, it does not appear that all ILOs have assessed. Only some of the program's assessment reports include a piece that would count as "closing the loop" or demonstrating improvement. Components 4-6 will discuss student learning and improvement in more detail, but overall, Humphreys has a great foundation, but needs to recommit assessment and program review using direct evidence.

The team believes the University is in compliance with Standard Four.

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

As stated in the Self-Study Report, "The purpose of the associate degree at Humphreys is to prepare students for entry-level work and for success at the bachelor level. The purpose of the bachelor degree is to prepare entry-level workers for advancement in their careers and to prepare

them for success in graduate studies. The purpose of the master degree is to prepare students for further professional advancement in their careers. Humphreys University has one doctorate program: the *juris* doctorate is a professional, terminal degree program that prepares students to become practitioners of law in California” (Self-Study Report, p. 15).

This statement captures the purpose of the Humphreys degrees and indicates the broad outcomes for each of the four degree types. In keeping with the university’s mission, there is an appropriate emphasis on career preparation at all degree levels. The university is quite clear about what they do, for whom they do it, and what the benefits of what they do are.

This alignment of mission with degrees helps the public to understand the “unique educational experience [to] be had at [the] institution and what makes the investment in that experience worthwhile” (Revised Handbook of Accreditation 34). Addressing the bachelor degree programs, the institution reports that a “bachelor degree at Humphreys means that graduates are prepared to advance in their positions” and that “[s]tudent surveys reveal that up to 75% of students are already working in jobs aligned with their career goals. Earning a bachelor degree at Humphreys means that these students are prepared to advance in their careers” (Self-Study Report, p. 15).

What seems to be somewhat less well articulated than the meaning of the bachelor degree is the meaning of the associate degrees. “At Humphreys, the associate degree level is increasingly viewed as simply the first half a [sic] bachelor degree” (Self-Study Report, p. 15). While external and internal factors such as “more high school graduates have chosen to attend the local community college to save money” and a decline in the number of graduates from Humphreys earning the associate degrees are offered as evidence, it is not clear whether the meaning and coherence of the associate degrees has changed as a result of these factors. The question is: have the meaning, coherence and challenge of associate degrees programs changed at all, or have they

remained the same with this new understanding of the associate degrees? Answering this will require deeper reflection on the part of the institution.

As the report explains it, the quality of the bachelor degrees are borne out through student self-reporting in NSSE (Self-Study Report, p. 28). This indirect assessment, while compelling and while useful for articulating the meaning of degrees, is not enough to demonstrate quality or that the institution is “maintaining an assessment infrastructure [with an examination of direct evidence] that enables [the] institution to diagnose problems and make improvements when needed” (Revised Handbook of Accreditation p. 34).

A thoughtful discussion of the master degree and of the role of educator-practitioners in teaching in the master programs includes mention of “student[s] learn[ing] from professors who are experienced and adept at overcoming real-world obstacles, whether the obstacles be on the factory floor, in the 2nd grade classroom, at a crime scene, or in the courtroom. The curriculum comes to students where they work. Theory meets life” (Self-Study Report, p.17). Also, the report shows a relationship between the curricula and co-curriculum with the latter including “student attendance at [professional] conferences related to their programs” (Self-Study Report, p.17).

The meaning of the juris doctorate degree is that “a graduate is prepared to take the California Bar Exam and, once passed, is ready to practice law in California.” This meaning was also echoed by alumni who met with the team during the accreditation visit. As stated in the institutional report, the JD “from Humphreys means a graduate is welcomed into a community of legal scholars and practitioners who are also fellow graduates of Humphreys.” Several alumni attested that local employees seek out graduates from the university’s Drivon School of Law. Yet, given the low bar pass rates, the team wonders whether the law school maintains an

assessment infrastructure that supports the ability to improve allows the University to improve upon these rates. Alternatively, asking the question: is it our goal for all of our students to become practicing attorneys, and if so, in what time frame?

Lastly, since the team has raised questions about how the institution's assessment infrastructure could prompt reflection and action related to the quality of the degree programs, it also looked at program review and examples of C-DATA evaluations to understand if the quality of the degrees were examined in these processes (this is discussed in more detail in Component 6).

Component Four: Educational Quality: Student Learning, Core Competencies, and Standards of Performance at Graduation

The close, individualized attention students receive at Humphreys creates a strong educational model. The team was impressed by the passion with which the faculty, students, and alumni spoke about their love for Humphreys and how the institution was life-changing for them. It was clear that everyone cares deeply about student learning and success. Alumni employers told the team that they only hire Humphreys graduates and that they are "great workers and employees." Clearly, Humphreys has been doing something right to create such a strong and committed community. However, having the sense that students are well-educated is very different than knowing exactly what skills and competencies they have at graduation. Additionally, breaking things down using assessment and evidence allows the institution to pinpoint areas that it needs to prioritize, which may change over time.

Student Learning and Core Competencies

Humphreys has worked since 2011 to develop ILOs, align them to Program Learning Outcomes (PLOs), and map them to each of the WSCUC core competencies (CFRs 2.2, 2.3, 2.6, 2.7). The one area of concern that the team had with regards to core competencies was the

institution's choice to split quantitative reasoning into two separate ILOs: critical thinking and information literacy. The institution states that this decision was made because the core competency could then be achievable in two of the existing ILOs. However, this argument is somewhat confusing considering that critical thinking and information literacy are themselves core competencies (CFR 2.2a).

During the site visit, the team found little evidence to demonstrate that quantitative reasoning was, in fact, being given separate (yet alone emphasized) consideration. When reviewing the ILO Assessment Report: Information Literacy & Quantitative Reasoning (2018), it appears that the institution may be conflating quantitative reasoning and quantitative data. Although both ILOs (Critical Thinking and Information Literacy) do include quantitative concepts as an element or criteria (showing that there is some institutional understanding of quantitative reasoning), it is possible that it is being lost in practice. Not giving individualized attention to quantitative reasoning may be part of the reason that this competency is not well-reflected when reviewing the programs and curriculum. Similarly, a review of the program assessments shows that many programs are not assessing quantitative reasoning when assessing critical thinking or information literacy, meaning it is not being properly aligned, even if it were arguably encompassed in the ILOs (CFR 2.3).

Standards of Performance at Graduation

Learning outcomes are published and embedded into programs and courses (CFR 1.2). The institution has drafted ILOs, PLOs, and faculty have drafted their own course learning outcomes. In Program Review, and some ILO and PLO assessments, a 4-point scale with a 3.0 benchmark has been set by the institution. Common rubrics incorporate the 4-point scale, and it is consistent

with the faculty course grading system. These rubrics are widely used by programs and faculty for assessments.

A review of the ILO Assessment Reports shows that many direct assessment criteria scores do not meet the institutional benchmark of 3.0, meaning the students are not consistently achieving the stated learning outcomes and standards of performance (CFR 2.6). Yet in many of the reports, the reviewers did not seem seriously concerned about this nor was this addressed in the Site Visit Report. In fact, assessment report writers often downplayed the direct data findings by emphasizing indirect evidence (e.g., student surveys) which demonstrated students were meeting the institutional standard. Through documents and conversations, it appeared that the common thought was that revision of learning outcomes was needed, not a more critical look at actions the institution should take to address these achievement gaps (CFR 4.4).

Although there is strong commitment to teaching and learning practices (CFR 2.4), and even use of assessment, the team did not find widespread evidence of institutional use of comparative data or aggregated data, and there was a heavy reliance on student evaluations (CFR 2.10). The entire institution would benefit from increased faculty training on student learning best practices and how this can be incorporated into the classroom and into institutional review.

When reviewing the data, it was impossible to tell what percentage of students were being assessed and how close they were to graduation. It is hard to show that graduates consistently achieve stated learning outcomes without knowing what percentage of graduates are represented (CFR 2.6).

Closing the Loop

Many of the reports, even the well-written ones, would have benefitted from a follow-up on how the assessment results were used to improve teaching and learning (i.e., closing the loop). A few program reviews stated what had happened since the last review, but that was the closest they came to closing the loop. That amount of time allows for errors in institutional memory and does not help the subsequent assessment teams to make informed plans and revisions. In the Institutional Report, the discussion surrounding “Closing the Loop” is about “action-oriented recommendations” and it talks about those recommendations. However, there was no demonstration of actual “closing the loop” in the report, other exhibits, or the site visit. Closing the loop is when the institution follows up on what has been done with these actionable items, such as the impact of any programmatic or curricular changes, revisions to assessments, or adjustments to learning outcomes. To “close the loop,” it is necessary for the institution to do more than just make recommendations; the institution or program must follow up on whether those changes have been implemented, and if so, their impact. When asked about this meaning of closing the loop, many people at the university stated that this was a weak point in assessment at the institution and admitted that it was not often done. Using the results of assessment to make improvements to teaching and learning is a critical step of the process (CFRs 4.4)

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

As the January 2020 Self-Study Report asserts: “Humphreys has made noticeable and significant strides over the past decade to gather, analyze, and use data for administrative, academic, and institutional purposes.” The team concurs that Humphreys significantly gathers data. The addition of Populi and the plan for assessment provide a solid foundation for the

University. While institutionalizing a culture of learning assessment and improvement is somewhat inconsistent across the entire curriculum, progress has been made to this outcome since the last report (CFR 1.2, 2.3). There is use of indirect evidence from NSSE and elsewhere to assess the student learning experience and student perception of their career preparation. The emerging MOU and subsequent annual review processes following program review are well founded. The Team understands that because of the very different nature of the various programs offered by the University, different assessment instruments need to be designed for each. The core Liberal Arts curriculum is reflected clearly in Humphreys' Institutional Learning Outcomes and is moving to a robust assessment strategy. All programs, the ILOs and Core Competencies are assessed and this data is accessible to all faculty, chairs, deans and the President (CFR 2.3, 2.4, 2.7). Humphreys has made strides over the past decade to institutionalize instruments that track student learning. However, the University needs to place more attention on the analysis of the data, especially where they indicate outcomes that are not sufficiently met. It is also less clear at present how these data are, or will be, used to identify areas for improvement and then incorporated on an ongoing basis in strategic planning and decision making.

The Team recommends that use of indirect evidence be balanced with a greater reliance on direct evidence across the institution. While the systems are in place for data collection (both direct and indirect), implementation, analysis, and action do not meet the expectations of these systems. It is not clear how the institution actually makes use of these data. For example, how are retention and graduation data or disaggregated data (for example, which student populations need support for outcomes) mapped to programs or to needed change within programs. While it is clear that some programs are using direct evidence in an intentional way for learning outcome improvement, this use is inconsistent across the University. The granular specificity of direct

evidence needs to be employed for change more robustly throughout the curriculum (CFRs 2.6.2.10-2.14)

Humphreys' Mission recognizes that the target students for the University are students whose educational goals are tied in a very direct way to a career, or to enhancing an already established career. Almost all Humphreys graduates express satisfaction in being prepared for their chosen career (CFR 2.2a).

There are vigorous student support services available through formal and informal mechanisms. The Learning Center provides regular access to online (remote) and in-person tutorials. More anecdotally, but nevertheless clearly part of the Humphreys educational culture, faculty and staff appear to be exceedingly accessible to students well beyond any formal office hours. This enhances our sense that the entire institution collectively understands its role as supporting student success (CFR 2.3).

The University has also made progress in tracking retention, persistence, and graduation data over the last decade. Data are disaggregated by many factors (race, ethnicity, gender, non-residents). However, graduation rates are relatively low, and concerning, (overall six-year graduation rate mid 40%, Self-Study, p. 31). While the Self-Study attributes this to a student population where the vast majority are working part-time or full-time, the team sees little real evidence in support of this correlation. Also, the team finds the term-to-term attrition rates of 10%-15% concurringly, and possibly unsustainably, high. As discussed in Component 6, The team believes that Humphreys needs to better understand their graduation and attrition factors in order to improve student success (CFRs 2.10-2,14).

The Team recognizes that Humphreys is deeply and historically committed to transforming its students' lives through a caring and rigorous educational experience. The loyalty expressed by its

students is striking, and they are very grateful for the opportunity that a Humphreys education provides.

We also recognize that there are looming challenges to student learning outcomes in the near and long term. With a strategic plan that intends to be a mostly remote learning experience, the University will need to adjust its assessment instruments accordingly.

Finally, it is important that student learning assessment and strategic plans for improvement be shared with and planned by the community at-large. New and expanded programs, if not planned as institutional efforts and instead are "...made expeditiously, and not implemented with sufficient transparency" (Humphreys University Self-Study Report January 2020, p.7) will result in debased institutional morale and a weakened learning environment.

Component Six: Quality Assurance and Improvement: Program Review; Assessment; Use of Data and Evidence

Program Review

Program Review has clearly been an historical priority for the institution; demonstrated by the well-developed report process, program review schedule, and guidance documents (CFR 4.6). Some individual programs did demonstrate a high-level and comprehensive understanding of student learning and assessment, which was reflected in the assessment reports and program reviews for those departments. The Early Childhood Education (ECE) Program Review is an excellent example of a comprehensive program review which utilizes quantitative and qualitative data (particularly emphasizing direct evidence), aggregated and disaggregated data on student demographics, and actionable recommendations for the program (CFR 2.10, 4.4).

However, other programs did not have as thorough reports, and often these reports were driven by data that leaned heavily towards indirect evidence or with recommendations that concluded that all that was needed were changes to the learning outcomes. The institutionally created C-DATA model (Community, Development, Advising, Teaching, Assessment) that the departments use to create their program review reports does not appear to guide programs into much co-curricular review (CFRs 2.11, 4.3). In turn, co-curricular review was lacking in nearly every program review provided to the team. Additionally, although there is a financial component, nearly every program review had zero to minimal (\$500) requests for funding to make changes for the entire program for a seven-year review period. Although requests for financial funding are not required, that is one way to monitor that the results of program review and the use of data analysis and academic planning are being considered and tied into financial and institutional planning decisions (CFR 4.1, 4.2). Relevant to this point, the team was informed that departments have no control over how much money they get for their own budgets and that all program budgets are decided by President Humphreys. In this way, academic planning and program development are disconnected from resource allocation (CFR 3.4, 4.7). The institutional response to this line of inquiry was that President Humphreys reviews assessment reports and requests for funding.

Assessment

The university created an ILO Assessment Handbook which provides guidelines and rubrics “for coordinating program and institutional assessment.” The assessment timeline provided to the team listed all ILOs being assessed by 2020. The team was not able to ascertain at the time of the visit if all ILOs had been assessed between 2014 and 2020 (CFR 2.4). The university provided

four assessment reports that had been conducted since 2014 (out of seven ILOs). For each ILO, the university used a combination of direct (i.e., PLO assessment reports, capstone projects, students' Major projects, student final works) and indirect (i.e., annual graduate surveys, NSSSE) evidence to demonstrate its graduates were achieving the stated learning outcomes (CFR 2.6). Administrators and faculty were knowledgeable about assessment to varying degrees, but it was clear the institution had made great efforts to try to create a culture of assessment (CFRs 1.2, 2.3-2.7, 4.3, 4.4). The law students were fully aware of course learning outcomes and assessments, and thought they also knew what the Program Learning Outcomes for the Law School were. However, although it appeared that many faculty, students, and staff were aware of learning outcomes, at an institutional level and in some programs, the assessments were conducted by administrators and only a few select faculty members without other stakeholders being regularly involved in the assessments and alignment of educational programs (CFR 4.5).

Consistent with this, most of the people who participated in preparing for the site visit and institutional review were members of the senior leadership. Although some of these leaders have demonstrated that they have a great deal of knowledge regarding assessment and institutional research, and as senior administrators they are in positions to implement decision-making and institutional change, there did not appear to be widespread inclusion from other community members, especially faculty and students, in the process. The team found no evidence during the off-site review or from the site visit that faculty and staff were being included in decision-making after evidence has been collected and evaluated (4.3). When different stakeholders were asked about participating in institutional assessment and improvement processes, many expressed a strong desire to be included, but said they currently were not (CFRs 4.5, 4.6). Additionally, there was no evidence that the highest levels of leadership, including those who

can implement financial and institutional change, are involved in academic learning improvements or programmatic change, and, alternatively, there appeared to be no mechanism for those who make academic learning improvements to tie those decisions to financial planning efforts other than by offering suggestions to President Humphreys (CFR 4.7).

The faculty seem incredibly invested in the learning and education of their students, which includes the teaching and learning within their courses. There was evidence that results of evaluating teaching effectiveness were used to improve curricula (CFR 4.4). Most faculty had some understanding of course assessment and some were aware of program assessment as well. A review of syllabi and conversations with faculty did show that many still confuse objectives and learning outcomes and use exams as the only assessments. This demonstrates that faculty could still benefit from additional training in student learning and assessment practices (CFR 2.6).

Use of Data and Evidence

Although there is a Dean of Institutional Research and each Assessment Report includes a “data” component, there is a disconnect between institutional planning processes and the use of data and evidence (CFRs 4.1, 4.2). The institution is collecting – or has the ability to collect – a great deal of valuable evidence that would provide meaningful evaluation; however, when asked about much of this data during the Site Visit, it appeared that it was collected, but not used for institutional reflection (CFRs 4.1, 4.2). The team was told that reports were prepared when departments or programs requested them. Beyond gathering IPEDS data, retention and graduation, Humphreys does not appear to be regularly analyzing, interpreting, and incorporating data into institutional review, planning and decision-making (CFR 4.2). A good example would

be that the new Strategic Plan does not include specifics on how the institution plans to assess its goals and what evidence they will use. Increasing or decreasing enrollment can have large impacts on specific student subgroups, which makes longitudinal assessment of admissions, retention, and graduation data important.

An inspection of different institutional and program review reports demonstrated a lack of consistent data utilization. Most reports show no long-term data collection or use of institutional research (CFR 4.1). For example, a review of the ILO Assessment Report on Careers included no long-term data assessment about employment trends, nor was employment disaggregated by student demographics (CFRs 2.6, 2.10). When asked, no person at the university was able to answer why employment placement/improvement information was not being tracked when that was stated as an important institutional outcome. Employment outcomes are common metrics tracked by institutions (CFRs 2.6, 2.7), and Humphreys could reach out to other institutions if it needs ideas on how to assess that outcome and collect data. It does not appear that there is a regular review of the effectiveness of current institutional research practices nor whether data should be disseminated more regularly or in different ways (CFRs 4.1, 4.2).

When thinking about the types of data collected and analyzed, the institution appeared to stick closely to student works and some student data. However, it was difficult to find much evidence that the institution was using direct evidence and utilizing aggregated and disaggregated data of student cohorts, beyond retention and graduation (and retention and graduation data was not applied consistently or across-the-board). There also appeared to be many sources for collection of data that were not being employed. Alumni employers emphatically told the team that they would love to participate in assessment efforts, polls, survey collections, or any other efforts that would help the institution, even stating they could assist in providing employment data.

Humphreys is not currently looking beyond senior administrators and faculty when planning assessment and data collection, and other constituencies appear eager to participate (CFR 4.5).

The supplied document on employment (8c Careers After Graduation) primarily references forms of indirect evidence (i.e., NSSSE and student surveys) to show that students feel they have acquired work-related knowledge and skills or are prepared for their fields. This fails to highlight a potential performance gap between student perceptions (indirect evidence) and student performance (direct evidence). It is always best to have multiple types of evidence, if possible, but one should be direct.

Component Seven: Sustainability: Financial Viability; Preparing for the Changing Higher Education Environment

Aligned with Humphreys' strategic goals, Humphreys has achieved reduced reliance on tuition revenue and has successfully diversified revenues, primarily, by renting the Stockton campus to Humphreys ABLE charter High School (Humphreys University Strategic Plan for 2019-2024 - Assumptions).

Humphreys' declining enrollment and revenue in the past five years (three years' operating results presented in the table below) and significant operating deficits will continue to impact Humphreys' ability to realize its strategic goals in future years. Tuition and fee revenue continues to decline despite increased enrollment projections. Deficit decreases are accomplished by cutting costs and increased revenue from other sources, not by increasing student headcounts and tuition revenue. Because the number of programs offered has not decreased, Humphreys must consider if the meaning, quality and integrity of degrees can be maintained despite deeper cuts each year.

		<u>FYE 6/30/2018</u>	<u>FYE 6/30/2019</u>	<u>FYE 6/30/20</u>
<u>Revenue</u>	Net Tuition	6,670,637	6,339,603	5,678,745
	Able Charter School	701,967	703,300	1,230,550
	Lease			
	Other Revenue	352,452	351,663	423,472
<u>Total Revenue</u>		7,725,056	7,392,566	7,332,767
<u>Total Expenses</u>		8,782,322	8,414,820	7,913,618
<u>Change in net assets</u>		(1,057,266)	(1,022,254)	(580,851)

(From Humphreys audited statements for fiscal years ended (FYE) 6/30/2018, 2019, and 2020)

Budgets for Programs' study of margin by program shows that the greatest revenue generator is the Law program with a surplus after both direct and indirect costs. All other programs appear to operate at a deficit despite deep cost cuts in recent years. This cost analysis could serve as the basis of assessing the financial sustainability of each program: the demand for the programs, the quality of same and investment that may be required to increase revenue. To consider investing more with anticipation of greater return, given Humphreys' limited resources, it may be necessary to suspend some programs to make way for the new programs, improved quality and innovative approaches envisioned in the strategic plan.

The availability of competitive low cost, public education in Stockton and Modesto markets and the decline in the number of high school graduates in recent years are viewed as the drivers for Humphreys troubling decline. To ensure financial viability, Humphreys must manage costs and refine its strategic plan to embrace its core competencies while overcoming the challenges of operating a private institution in Stockton and Modesto. Humphreys recognizes that its students

are drawn to Humphreys’ “personalized, affordable, accessible” education that is “career-oriented,” “aligned with career and skill demands, integrated into the professional community, and delivered by dedicated practitioner-educators” (Self-Study Report).

Humphreys Strategic Plan 2019-2024 recognizes that long term sustainability will depend on “diversification of revenue streams,” the need to “align institutional resources commensurate with needs of academic standards and administrative services to effectively serve students” and to “maintain a reasonable class size and student/teacher ratio”.

The program strategies were further refined in the Revised Strategic Plan 2019-2024, For example, Strategy 1b is to “Align current, and seek to develop targeted new programs to have clear career outcomes and culminate in or include industry-recognized certifications/credentials. Develop stackable programming and lifelong learning/upskilling opportunities”.

It is not evident from the documents presented that Humphreys’ has approached the challenge of deficits, the pandemic, declining enrollment and shifting market share collaboratively – involving thought leaders at all levels of the institution – Board, Administrative and Academic leadership. It is not evident that prior year operating results, the results of assessments and program reviews were used to plan the allocation of resources or to project/plan operations for subsequent years or that program quality and integrity of degrees remain the focus of Humphreys budget planning. It is also not evident that they have analyzed the costs inherent in the strategic plan.

Component Eight: (N/A)

Component Nine: Conclusion: Reflection and Plans for Improvement

The university concludes their Self-Study noting that “Humphreys University has gone through a slashing storm, precipitated by steep enrollment declines, that has caused many other institutions of similar size to sink” (p. 47). The university utilized three strategies to address the decline in enrollment: decreasing expenses; improving revenue through its rental agreement with the Able Charter School that uses its campus; and adding new programs. The expense reductions have been noteworthy but not sufficient to eliminate deficits. However, it has been able to use reserves built up during times of high enrollment to cover the deficits. The increased income from the Able School (and the PPP and other federal funds of last year) have improved the revenue picture. The Able School contributed 9% of revenue in FY18 and 16% in FY20. The pandemic-related federal funds received in FY21 resulted in a revenue surplus in FY21. The addition of new programs has not altered the declining tuition revenue.

The team remains deeply concerned about the University’s potential to turn around the enrollment numbers and bring its finances back into balance. Analysis is needed to evaluate program viability that considers program costs as well as potential income. Similarly, analysis is needed to evaluate academic resource needs to ensure that the university can offer quality degrees.

Humphreys has revised its strategic plan since writing the 2020 Self Study. The team’s comments here refer to the new strategic plan, revised in 2021. The first strategy is to adapt all programs for online and blended instruction, create new career relevant programs, and invest in technology, online instructional design, and enrollment management. The second strategy is to invest in enrollment management and marketing. The third strategy is to increase international enrollment through partnerships with international recruiting companies. The fourth strategy is to

recruit graduating seniors from the Able School. All of these strategies include enrollment goals but without any indication of how those numbers were calculated or what expenditures would be needed to achieve them. There are no timelines for developing the needed new resources and staffing nor is there discussion of the current challenges in international recruitment or the university's lack of success in attracting Able School graduates to enroll at Humphreys.

The strategic plan does not reference improving graduation and retention rates. The team sees this as important to the future. The university needs to better understand the causes of its high levels of attrition and track the impact of strategies to improve retention.

Humphreys University benefits from its long history with the Stockton-Modesto communities and from a committed faculty and staff. These are strengths the university can build upon to turnaround the enrollment and finances. Data on educational effectiveness could be more effectively used to demonstrate the university's impact on its students. The alumni and employers the team met were very positive about the university and could be involved in further building its public profile. Leadership, transparency, and campus participation will be essential if the university is going to be successful in rebuilding enrollment and finances.

SECTION III- FINDINGS, COMMENDATIONS, AND RECOMMENDATIONS FROM THE TEAM REVIEW

Humphreys University has an important mission to which the faculty and staff are committed. The university expects faculty to be actively involved in the Stockton community and is proud of its long-term commitment to Stockton.

Commendations

- **The University has operated within Stockton for 125 years. Its historical mission to serve the Central Valley by offering career-focused education grounded in the liberal arts is compelling and well-supported by faculty and staff. The University is making a commendable effort to support the mission through the new position of Director of Business Development, charged with building relationships within the Central Valley to support outreach and program development.**
- **Students and alumni demonstrate a deep appreciation and enthusiasm for their educational experiences. In particular, law school students express that they would not have the opportunities now open to them without this university. Alumni employers mention that they prefer to hire Humphreys graduates.**
- **Faculty and staff express and demonstrate a deep commitment to supporting students in pursuit of their education. The personalized and generous attention they offer contributes to student success and is recognized by students and alumni as a particular strength of the university. Innovative support systems are in place at the university for new enrollees and continuing students.**
- **The University's wedding of career preparation and liberal arts prepare their students for work, citizenship, and lifelong learning.**

- **The University has realized increased business efficiencies and reduced costs through outsourcing certain business functions.**
- **Humphreys has learned from its online experience during the pandemic and re-conceptualized its offerings to focus on online and hybrid learning. Its model of everywhere learning allows students to enroll in a course as an in-person student joining faculty teaching from campus or as a distance student engaging from off-site.**
- **The Law School has successfully educated practicing attorneys in the Central Valley.**

Recommendations

- **The team is concerned that the University seems to be moving away from its historic mission in its revised strategic plan without the full knowledge or support of the campus community. The plan appears to have been developed by the President without the appropriate engagement of University constituencies. (CFRs 1.1, 1.7, 4.6)**
- **The University's organizational structures and decision-making processes are not clear. Roles, responsibilities, and lines of authority are ambiguous. This has resulted in an institution that is unable to support strategic decision-making. In particular, the absence of designated academic leadership, above the level of the deans, threatens educational effectiveness. In addition, the team is concerned that the CEO is fulfilling so many different organizational functions that it has become**

challenging to provide the leadership the university needs in areas like community visibility and fundraising. (CFRs 3.7, 3.8)

- **The team understands that Humphreys seeks to serve the needs of the Central Valley and of students from diverse economic, educational, ethnic, and cultural backgrounds. Its long history in the area means that the university has connections to communities that could help it understand the education needs of the area and how to best serve them. The Board and other leadership structures need to be revised to incorporate such voices. The Board needs to establish a tradition of self-review and training in order to enhance its effectiveness. (CFRs 1.4, 3.9)**
- **Since 2012, the University has experienced a precipitous drop in enrollment that has resulted in five years of deficits. It currently offers seven AA degrees, eight Bachelor's degrees, four Master's degrees, and one professional doctoral degree to 375 students. While the commitment to balance the budget is admirable, leadership needs an academic master plan to ensure that programs are effectively reviewed and resourced to maintain academic quality. (CFR 4.1)**
- **Faculty workload remains an issue with full time faculty teaching 2-3 (sometimes 4) courses each quarter along with advising and administrative responsibilities. While class sizes have declined, this number of course preparations do not allow time for faculty scholarship. The heavy teaching load also means that students in some programs are taught by the same individuals repeatedly. (CFRs 2.1, 2.8)**
- **Financial analysis of programs continues to be needed. Financial decisions need to support degree quality and integrity which requires a CFO that engages with the campus community. Humphreys needs to provide data and analysis of the**

incremental costs of new and existing programs, including the impact on workloads to support student success, and description of how educational effectiveness is to be assessed.

- **Assessment data and program review should be utilized to implement needed changes and improvements throughout all programs. Additionally, there needs to be increased faculty education and inclusion in order to foster a culture of assessment. The Law School continues to need to assess its program learning outcomes and to conduct ongoing program review and analysis. The university has articulated a quality assurance program but needs to develop outcomes assessment grounded in examination of student work that can provide data to feed back into program improvement.**
- **The University has developed detailed program review guidelines and procedures and needs to recommit to consistently reviewing programs on a defined schedule. Recommendations for improvement need to be utilized by the program and the university in planning and decision-making processes (i.e. academic, financial, etc.). The team notes with concern that a number of the recommendations made after the 2013 visit were not addressed. That the university is smaller than it was in 2013 does not in itself resolve these issues. (CFR 1.8)**

APPENDICES

Appendix A.

1 - 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? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
	If so, where is the policy located? Catalog
	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)? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
	If so, does the institution adhere to this procedure? <input checked="" type="checkbox"/> YES <input type="checkbox"/> 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? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
	Comments:
Sample syllabi or equivalent for online and hybrid courses <i>Please review at least 1 - 2 from each degree level.</i>	How many syllabi were reviewed? All syllabi undergo periodic review
	What kind of courses (online or hybrid or both)? Both
	What degree level(s)? <input checked="" type="checkbox"/> AA/AS <input checked="" type="checkbox"/> BA/BS <input checked="" type="checkbox"/> MA <input checked="" type="checkbox"/> Doctoral
	What discipline(s)? All syllabi undergo periodic review
	Does this material show that students are doing the equivalent amount of work to the prescribed hours to warrant the credit awarded? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
	Comments:
Sample syllabi or	How many syllabi were reviewed? All syllabi undergo periodic review

equivalent for other kinds of courses that do not meet for the prescribed hours (e.g.,	What kinds of courses? Internships, independent study
	What degree level(s)? <input type="checkbox"/> AA/AS <input checked="" type="checkbox"/> BA/BS <input type="checkbox"/> MA <input type="checkbox"/> Doctoral
	What discipline(s)? All undergraduate programs

p. 1 of 6

internships, labs, clinical, independent study, accelerated) <i>Please review at least 1 - 2 from each degree level.</i>	Does this material show that students are doing the equivalent amount of work to the prescribed hours to warrant the credit awarded? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
	Comments:
Sample program information (catalog, website, or other program materials)	How many programs were reviewed? All programs are reviewed for this information
	What kinds of programs were reviewed? All program are reviewed for this information
	What degree level(s)? <input checked="" type="checkbox"/> AA/AS <input checked="" type="checkbox"/> BA/BS <input checked="" type="checkbox"/> MA <input checked="" type="checkbox"/> Doctoral
	What discipline(s)? All program are reviewed for this information
	Does this material show that the programs offered at the institution are of a generally acceptable length? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
	Comments:

Review Completed By: President, ALO

Date: 12/4/19

2 - 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? ✓ YES <input type="checkbox"/> NO
	Comments:
Degree completion and cost	Does the institution provide information about the typical length of time to degree? ✓ YES <input type="checkbox"/> NO This is monitored regularly by academic advisors and the Office of the Registrar: https://www.humphreys.edu/student-support/office-of-the-registrar/
	Does the institution provide information about the overall cost of the degree? ✓ YES <input type="checkbox"/> NO
	Comments: On-line forms, documents and information are available at: https://www.humphreys.edu/admissions-aid/financial-aid/
Careers and employment	Does the institution provide information about the kinds of jobs for which its graduates are qualified, as applicable? ✓ YES <input type="checkbox"/> NO Each program site suggests possible career paths. Here are two examples: https://www.humphreys.edu/academics/legal-studies/ https://www.humphreys.edu/academics/early-childhood-education/
	Does the institution provide information about the employment of its graduates, as applicable? ✓ YES <input type="checkbox"/> NO
	Comments: Employment information is provided in a general sense, as applicable. For example, the demand is very high for court reporters.

*§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: President, ALO
 Date: 12/4/19

3 - 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? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
	If so, is the policy or procedure easily accessible? If so, where? Yes, online catalog
	Comments:
Process(es)/ procedure	Does the institution have a procedure for addressing student complaints? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO If so, please describe briefly: A complaint is assigned to a dean.
	If so, does the institution adhere to this procedure? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
	Comments:
Records	Does the institution maintain records of student complaints? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO If so, where? The deans maintain these records.
	Does the institution have an effective way of tracking and monitoring student complaints over time? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO If so, please describe briefly: The number of complaints is very small, a few a year.
	Comments:

*§602-16(1)(1)(ix)

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

Review Completed By: President, ALO
 Date: 12/4/19

4 – 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? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
	If so, is the policy publically available? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO If so, where? Online catalog
	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? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
	Comments:

*§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 graphic from next page from on-line catalogue.

See also WASC Senior College and University Commission’s Transfer of Credit Policy.

Review Completed By: President, ALO
Date: 12/4/19

TRANSFER CREDIT

Students who wish to obtain credit for subjects taken at other regionally accredited colleges/universities must furnish an official academic transcript to the Registrar's Office. The Registrar will make an evaluation of credits and will inform the student as to the amount of credit allowed.

Credit will be allowed only for subjects related to the degree curriculum as outlined in the Humphreys University General Catalog and only for subjects completed with a grade of C- or better. Under special circumstances a student may receive up to 12 units of credit for previous work experience. Application for credit should be made through the student's academic chair.

p. 6 of 6

Appendix B.

Modesto Campus
Virtual Visit
Judie Wexler
12/7/2021

1. Site Name and Address

Modesto Branch Campus
5172D Kierman Court
Salida, CA 95368

2. Background information (number of programs offered at the site; degree levels; FTE of faculty and enrollment; brief history of this site; branch campus or satellite location by WASC.

This branch campus, 20 miles from Stockton, offers Associate and Bachelor's degrees in six of the eight areas offered by the main campus (the exceptions are court reporting and the

Bachelor of Science in Accounting). Since 2018 it has also offered the Master of Arts in education with the credential program. The director would like to add more graduate programs.

Classes are offered online and in a hybrid approach with students who chose to attend in person joining faculty teaching from a Modesto classroom. Students can also come to the Modesto campus for courses streamed from Stockton. Since courses are now offered online, they are generally shared between the Modesto and Stockton campuses.

The campus director teaches one course each quarter, advises all of the students enrolled at Modesto, tracks all students on academic warning, and provides writing and math tutoring in addition to being the director of institutional research for the university. The university library is digital, the Stockton undergraduate library having been liquidated. Library staff provides online support in accessing library materials.

In addition to the director, the Modesto campus employs one full time faculty member, an admissions counselor, a student services professional, maintenance staff, and a core group of long-term adjunct faculty. In Fall 2021 there were 71 students enrolled at Modesto, a decline from 93 in fall 2017.

The campus is located in a business park outside Modesto. It includes four classrooms, a community room, and a computer lab.

3. Nature of Review (material examined and persons/committees interviewed)

The review was conducted via Zoom with the director of the campus. No additional written material was provided about the campus. The university does not maintain data by campus apart from enrollment.

Arcadia Program
Virtual Visit
Eric Frank
12/9/2021

1. Site Name and Address

Arcadia Business Administration Degree Completion Program
American Institute of Knowledge Management
17595 Alahurst Street #200, 208
City of Industry. CA 917488

2. Background information (number of programs offered at the site; degree levels; FTE of faculty and enrollment; brief history of this site; branch campus or satellite location by WASC.

This branch program, located in the City of Industry (not in Arcadia, CA) offers a one year completion program for students who have completed three years of undergraduate education elsewhere. Students receive a Humphreys B.S. in Business Administration. It seems to have been established in 2014. The director would like to add more students to the program.

Students have access to all Humphreys online resources. Classes are offered online and in a hybrid approach in the City of Industry classrooms. In Fall 2021 there were 22 students enrolled at Arcadia, a decline from 51 in Fall 2019. Revenue collected in 2021 was \$225,000- a decline from \$442,000 in 2019. Projected revenue (from Strategic Plan Budget Model) is \$270,000 annually. It is unclear who is responsible for supervising the program, how students apply for the program, or how it is determined that students graduating with a Humphreys degree have satisfied Humphreys' General Educational Requirements.

3. Nature of Review (material examined and persons/committees interviewed)

The review was conducted via Zoom with the program director, Mr. Lloyd Sun. No additional written material was provided about the program, and no MOU establishing the program was provided. The university does not maintain data by campus apart from enrollment.