



June 27, 2014

Dr. Joseph D. Shepard
President
Western New Mexico University
P.O. Box 680
Silver City, NM 88062

Dear President Shepard:

Attached is your completed Quality Checkup Report. The team did determine some concerns as noted on page 18 of the report that pertain to federal compliance issues. Please refer to the comments section on page 18 for a detailed discussion of those concerns. As a result, we are requiring an update on these matters to be submitted to the Reaffirmation Panel in 2014-15. As you will be preparing documentation for the panel that will provide updates on what has occurred since the Checkup Visit, please include a special section specifically discussing what has happened or is planned to happen to address the items of concern on page 18.

If you have further questions please call me anytime.

Sincerely, _____


Stephanie Brzuzy, PhD
Vice President for Accreditation Relations

cc: Dr. Faye N. Vowell, Accreditation Liaison Officer



QUALITY CHECKUP REPORT

Western New Mexico University

Silver City, New Mexico
April 2–4, 2014

The Higher Learning Commission
A Commission of the North Central Association

QUALITY CHECKUP TEAM MEMBERS:

Nancy Stokes
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Background on Quality Checkups conducted by the Academic Quality Improvement

Program

The Higher Learning Commission's Academic Quality Improvement Program (AQIP) conducts Quality Checkup site visits to each institution during the fifth or sixth year in every seven-year cycle of AQIP participation. These visits are conducted by trained AQIP Reviewers to determine whether the institution continues to meet The Higher Learning Commission's *Criteria for Accreditation*, and whether it is using quality management principles and building a culture of continuous improvement as participation in the Academic Quality Improvement Program (AQIP) requires. The goals of an AQIP Quality Checkup are to:

1. Affirm the accuracy of the organization's Systems Portfolio and verify information included in the portfolio that the last Systems Appraisal has identified as needing clarification or verification (System Portfolio Clarification and Verification), including review of distance delivery and distributed education if the institution is so engaged.
2. Review with organizational leaders actions taken to capitalize on the strategic issues and opportunities for improvement identified by the last Systems Appraisal (Systems Appraisal Follow Up);
3. Alert the organization to areas that need its attention prior to Reaffirmation of Accreditation, and reassure it concerning areas that have been covered adequately (Accreditation Issues Follow Up);
4. Verify federal compliance issues such as default rates, complaints, USDE interactions and program reviews, etc. (Federal Compliance Review); and
5. Assure continuing organizational quality improvement commitment through presentations, meetings, or sessions that clarify AQIP and Commission accreditation work (Organizational Quality Commitment).

The AQIP peer reviewers trained for this role prepare for the visit by reviewing relevant organizational and AQIP file materials, particularly the organization's last *Systems Appraisal Feedback Report* and the Commission's internal *Organizational Profile*, which summarizes information reported by the institution in its *Annual Institutional Data Update*. The Quality Summary Report provided to AQIP by the institution is also shared with the evaluators. Copies of the Quality Checkup Report are provided to the institution's CEO and AQIP liaison. The Commission retains a copy in the institution's permanent file, and will be part of the materials reviewed by the AQIP Review Panel during Reaffirmation of Accreditation.

Clarification and verification of contents of the institution's *Systems Portfolio*

The Team reviewed the Systems Portfolio submitted by Western New Mexico University (WNMU) and the feedback report before arriving for the Quality Checkup visit to gain an understanding of the College. During the visit, the Team verified and clarified the contents of the System Portfolio through discussions held with the members of the President's Cabinet (VP of Academic Affairs, VP of Business Affairs, VP of Student Affairs, Assistant to the President for Strategic Initiatives, and the Accreditation Liaison Officer), member of the Board of Regents (BOR), faculty, staff, and students.

For most parts of the Systems Portfolio, information that was presented in the document was generally understood and the Western New Mexico Management Team agreed that the Appraisal feedback was accurate. At other times in the Systems Portfolio, either the information was not detailed enough or the original reviewers' understanding of the answer was not complete. These inconsistencies were clarified by onsite discussion.

In the Team's judgment, the Institution presented satisfactory evidence that it met this goal of the Quality Checkup. The institution's approach to the issue, documentation, and performance were acceptable and comply with the Commission's standards and AQIP's expectations.

Review of the organization's quality assurance oversight of its distance education activities.

In the Team's judgment, the Institution has presented satisfactory evidence that its distance education activities are acceptable and comply with the Commission's standards and expectations.

WNMU online courses are monitored through the same channels as the regular offerings. The Dean for Extended Campuses and her staff provide technical and pedagogical support to faculty who teach courses online. As WNMU expands its online offerings, it could consider expanding the support to include additional resources to support the faculty.

Review of the organization's quality assurance and oversight of distributed education (multiple campuses)

While WNMU has other locations to provide services to students, it does not have multiple campuses. The services offered in the locations are coordinated by a Director who is closely tied to decision-making structure of the Institution.

Review of specific accreditation issues identified by the institution's last Systems Appraisal

The Institution did not have any accreditation issues identified in the 2014 Systems Appraisal.

Screening of Criteria for Accreditation and Core Components

The following section identifies any areas in the judgment of the Quality Checkup Team where the institution either has not provided sufficient evidence that it currently meets the Commission’s *Criteria for Accreditation* (and the core components therein) or that it may face difficulty in meeting the *Criteria* and core components in the future. Identification of any such deficiencies as part of the Quality Checkup affords the institution the opportunity to remedy the problem prior to Reaffirmation of Accreditation. Items judged to be “Adequate but could be improved” or “Unclear or incomplete” during the Checkup Visit screening will not require Commission follow-up in the form of written reports or focused visits. However, Commission follow-up will occur if the issues remain apparent at the point of reaffirmation of accreditation.

Criterion 1: Evidence found in the Systems Portfolio	Core Component				
	1A	1B	1C	1D	
Strong, clear, and well-presented.	X	X	X	X	
Adequate but could be improved.					
Unclear or incomplete.					
Criterion 2: Evidence found in the Systems Portfolio	Core Component				
	2A	2B	2C	2D	2E
Strong, clear, and well-presented.		X	X	X	X
Adequate but could be improved.	X				
Unclear or incomplete.					
Criterion 3: Evidence found in the Systems Portfolio	Core Component				
	3A	3B	3C	3D	3E
Strong, clear, and well-presented.	X	X	X	X	X
Adequate but could be improved.					
Unclear or incomplete.					
Criterion 4: Evidence found in the Systems Portfolio	Core Component				
	4A	4B	4C		
Strong, clear, and well-presented.	X	X	X		
Adequate but could be improved.					
Unclear or incomplete.					
Criterion 5: Evidence found in the Systems Portfolio	Core Component				
	5A	5B	5C	5D	
Strong, clear, and well-presented.	X	X			
Adequate but could be improved.			X	X	
Unclear or incomplete.					

2A. The institution operates with integrity in its financial, academic, personnel, and auxiliary functions; it establishes and follows fair and ethical policies and processes for its governing board, administration, faculty, and staff.

Adequate, but could be improved

While WNMU has posited core values that emphasize integrity, a code of conduct, and ethics training, the institution would benefit from identification of processes that ensure ethical behavior in specific areas such as financial, support services, and administrative operations.

5C. WNMU engages in systematic and integrated planning.

Adequate, but could be improved

Clearly, WNMU is making strides to make its strategic planning process more formal and link this process to other processes that direct long-term and short-term decisions. In its deployment of the AQIP Action Project: Evaluate and Revise WNMU's Strategic Planning Process, the Institution has identified a clear decision-making process that identified the key issues through SWOT analysis, gathered feedback through surveys and focus groups, and analyzed the results to set goals. Two planning groups – the University Planning Council (UPC) and the Quality Policy Council (QPC) are involved in this action project. The two groups in their discussions this past year have clearly started to grapple with the idea that multiple processes inform and are affected by the strategic planning process and the strategic plan. The UPC and QPC have had discussions about appropriate measures with timeline for some of the goals; however, at this point these ideas have not yet been translated to particular measures and values.

The President charged the Building Capacity and Capability Steering with developing a vision of the future that recognizes the dynamic impact changing roles of faculty, technology, pedagogy, work environments, and other relevant factors may have on WNMU's ability to effectively address the needs of current and future students.

5D. The institution works systematically to improve its performance.

Adequate, but could be improved

While a culture of continuous improvement is relatively new at WNMU, the institution provides evidence that they are working to systematically improve its performance. This is apparent through the development of performance dashboards and the work of various committees and councils. WNMU has established measures of effectiveness (MOEs) tied to its Strategic Plan as a means of monitoring progress. Information is disseminated and analyzed through the institution's committee structure. However, knowledge of what data are collected, which processes influence these data trends, how to access such data are still questions among decision makers. As a result, there still seems to be a tendency to find solutions and make changes based on "feeling" rather than on data and information. The implementation of processes is new, so effectiveness remains to be determined. It is not clear that processes are documented and that such documentation is

widely shared. Further, the application of the process view seems to be limited to completing tasks and is rarely applied to seeking improvements in the process and process measures. Some pockets in the administrative areas, such as the bursar's office, have used knowledge of processes and process steps to identify resource needs. WNMU learns from operational experience and applies that learning to improve institutional effectiveness, capabilities, and sustainability as evidenced by its recent effort to prioritize academic programs and services.

In the team's judgment, the institution presented satisfactory evidence that it met this goal of the Quality Checkup. The institution's approach to the issue, documentation, and performance were acceptable and comply with Commission and AQIP's expectations.

Review of the institution's approach to capitalizing on recommendations identified by its last Systems Appraisal in the Strategic Issues Analysis.

In the team's judgment, the institution presented satisfactory evidence that it met this goal of the Quality Checkup. The institution's approach to the issue, documentation, and performance were acceptable and comply with Commission and AQIP's expectations.

The 2014 Systems Appraisal Feedback report identified three strategic issues: processes not clearly delineated; selection and use of process metrics and measures; and lack of consistent formal communication systems. Since the quality check up visit was conducted within a few months of the receipt of feedback report, the discussions during the visit focused on actions already in progress (through Action Projects or other initiatives) that addressed the areas in the strategic issues identified in the 2014 Systems Portfolio Feedback Report. The School has three ongoing AQIP Action Projects activated in response to the feedback to the 2010 Systems Portfolio: Enhance/Redesign Webpage for Accessibility and Student Recruitment and Enrollment; Evaluate and Redesign General Education Program and Its Assessment; Evaluate and Revise WNMU's Strategic Planning Process. The outcomes from these Action Projects have implications for the strategic issues identified in the 2014 Systems Appraisal Feedback report.

- I. **Processes:** Lack of delineated process and a reliance on informal processes indicating a reactive rather than proactive approach

The discussions during the visit, particularly during the session addressing assessment, strategic planning, and AQIP Action Projects, covered questions regarding the processes used, ownership of and participants in the processes, and the links between the different processes. In its deployment of the AQIP Action Project: Evaluate and Revise WNMU's Strategic Planning Process, the Institution has identified a clear

decision making process that identified the key issues through SWOT analysis, gathered feedback through surveys and focus groups, and analyzed the results to set goals. Two planning groups – the University Planning Council (UPC) and the Quality Policy Council (QPC) are involved in this action project. While the UPC worked on developing the strategic planning process, and later the strategic plan (not yet completed), the QPC focused on critiquing the draft plans with a focus on supporting an environment of continuous quality improvement. The two groups in their discussions this past year have clearly started to grapple with the idea that multiple processes inform and are affected by the strategic planning process and the strategic plan. The project team has identified that the implementation of the strategic plan would necessitate changes in the program review process, program prioritization process, processes in student services, and the communication processes.

The AQIP Action Project, Evaluate and Redesign General Education Program and Its Assessment also addressed some process issues such as process ownership (where should the “assessment” process reside) and link to other processes. It was clear in the discussions that the group has spent time considering issues of alignment of course assessment process to the program assessment process, relationship of the assessment process cycle to the 5-year program review cycle, as well as the prioritization process that is currently being developed.

While it is heartening to see elements of process discussion becoming part of AQIP Action Projects, such discussion remains mostly in the planning levels and in the context of these projects. While there seems to be an understanding of process steps for a few areas, such as curriculum changes and program review, it is not clear that these processes are documented and that such documentation is widely shared. Further, the application of this process view seems to be limited to completing tasks and is rarely applied to seeking improvements in the process and process measures. Some pockets in the administrative areas, such as the bursar’s office, have used knowledge of processes and process steps to identify resource needs.

The Institution would benefit from clearly documenting current processes, seeking modifications to make the processes more effective, formalizing these processes, and collecting measures that would help track their performance. Clearly there is a recognition among the administrators, faculty, and staff that with the new fiscal pressures on institutions in higher education a process approach with a cycle of process→measures→ set targets for improvement approach is essential to finding solutions related to student learning, cost reduction, and revenue enhancement. WNMU needs to focus on ensuring that attention to processes becomes systemic and more systematic in order for it to make strides in its improvement journey.

II. **Measures:** Lack of development of specific and appropriate metrics, including setting goals and

comparing its results to both its own data as well as the data of comparable institutions

A lack of a process view is clearly reflected in the lack of development of metrics and the identification and use of appropriate data for decision-making. Once again, some of the work done on the current Action Projects points to a better focus on measures. For example, the UPC and QPC working on the AQIP Action Project on strategic planning have had discussions about appropriate measures with timeline for some of the goals; however, at this point these ideas have not yet been translated to particular measures and values. This project also has used data, mostly qualitative information from survey results and feedback, in developing the planning process and the new strategic plan. The AQIP Action Project webpage design has used measures such as number of clicks and time spent on the page to determine the efficacy of some of the features being considered. Discussions about assessment plans (both general education and programs assessment) point to the recognition of the goal (and hence the measure for) student success and improvement in student skills. Appropriate measures for student success are yet to be clearly identified, especially with the state funding formula now more focused on outcome measures (graduation and retention), rather than enrollment. There is recognition among faculty and staff that curriculum redesign, program offerings, and remediation/developmental process all impact graduation; there is work to be done identifying appropriate measures for these processes and linking them to the overall outcome of graduation and retention. It is clear that Institutional Research collects a number of different measures; however, knowledge of what data are collected, which processes influence these data trends, how to access such data are still questions among decision makers. As a result, there seems to be a tendency to find solutions and make changes based on “feeling” rather than on data and information. It would also be beneficial for the Institution to identify peer institutions to compare itself with as it works on making curricular, program, and assessment changes.

III. **Communication:** Reliance on informal communication; opportunity to develop more formal communication processes to ensure consistency, formality, and integrity of message

The discussions during our visit point to actions in place to provide multiple constituents access to information regarding decisions made and issues discussed at various levels. Formal systems exist for top-down communications. The President communicates with all the constituents regularly (weekly at present) about the changes in higher education, their impact on WNMU, and specific decisions that are being considered, and actions taken. The meetings of the BOR are now streamed live, and archived for the future viewing. Agendas for the BOR meetings are available prior to the meetings. The minutes of the UPC, Dean’s Council, Faculty Senate, and Staff Senate meetings are available via the Listserv. These improved forms of communication have been especially valuable in the current context of funding changes and the many changes in programs and services that are being discussed and WNMU. Faculty

members point to the need to develop more formal procedures and timelines for such communications, including minutes and agenda. Also, improvements in accessibility of the minutes, current and archived, are being considered. As the AQIP Action Project for development of the website moves forward, ideas for easy, one-button, access to current and archived information for specific constituents (faculty, staff and students) are being discussed. Communications to students use multiple modalities – email, Facebook, and twitter. WNMU should consider methods to evaluate the effectiveness of these forms of communications with a view of improving access and reaching a larger percentage of the constituents.

Bottom up communications is enabled through regular meetings of faculty, staff, and student senate leaders with the President's Cabinet and the Provost. As necessary, feedback is sought from different constituents through surveys and the web. An example of this is the web-based feedback sought from all constituents, including the local citizens about suggestions for cost reduction and revenue enhancement. For the most part, however, bottom up communication remains informal. WNMU should consider the different types of information communicated and the purpose of the communication to develop procedures that consider time and mode of communication.

Other AQIP Considerations or Concerns

Fiscal concerns:

Currently WNMU gets 35 % of its funding from tuition and 65 % from the state, with the states funding formula lagging by 3 years. In 2010, with the closing of the mine, enrollment increased by 25 %. This increase in enrollment was not funded for three years. WNMU drew on its reserves (\$ 5 million in 2009) to support services for these students. WNMU drew a further \$1.7 million in 2012 to expand faculty resources by hiring 34 new faculty members. The Institution cut costs in 2013-14 by \$1.3 million (partly by cutting back 5 faculty positions through terminal contracts for the new hires). WNMU plans to cut costs further by \$2.9 million in 2104-15. This cost cutting and the receipt of state funding (3-year lag) to reflect 2010 enrollment would help bring back the reserves held to 2009 levels. This plan for cuts is based on consideration of different scenarios for enrollment and costs as well as using very conservative estimates for enrollment. As a result the Institution is very confident that the planned cuts will be achieved. In addition, WNMU is considering changes in the tuition and fee structure and increasing its international student base to find ways to increase revenue. The Institution also plans to improve its fund raising efforts and is working on increasing its donor and alumni base.

Enrollment Management:

Enrollment at WNMU is closely tied to the local economy. As the job market improves, enrollment drops

and vice versa. One way to insulate itself from the cycles in the local economy is to increase the percentage of international students. WNMU has been working towards this by taking advantage of its proximity to the border and education support programs of other countries (Mexico and Brazil). The Institution, under the leadership of the VP of Student Affairs and Enrollment Management, has been evaluating its current approaches to improve student retention. Student Affairs had a planning retreat and identified five goals for its operations – know your student, improve retention, improve enrollment, improve customer service, and improve communications. WNMU continues its efforts to help underprepared students overcome their deficiencies. Taking a more careful look at their student body, and possibly use some predictive analysis, could help WNMU improve and better target its remediation efforts. Similarly, the Institution would benefit from a more detailed analysis of reasons for dropout in order to identify actions to improve student retention and persistence. WNMU recognizes that retention is also affected by students' financial and family needs. The Student Life division takes a broad approach to student support providing counseling and living support through donations from the community. The Capital Plan includes construction of a multi-activity recreation center to improve student life on campus. WNMU participates in the Higher Education Reaching Out (HERO) to increase dual enrollment as a way to draw more high school graduates to WNMU. The Institution also has plans to allow students to declare majors as freshmen – this not only improves student commitment to WNMU, but also links them to program faculty, which improves advisement, support, and hence retention. The AQIP Action Project on Website design is also focused on reaching students early and communicating better with current and prospective students.

While WNMU continues to focus its efforts to improve enrollment, retention, and persistence, the changes in the state funding formula to focus on outcome measures of graduation rates in addition to retention, and persistence presents new challenges. The funding formula makes actions to improve graduation rates an urgent imperative, since just growth in enrollment will not increase funding, but improved graduation rates would. Student Affairs and campus faculty leaders have started conversations about ways to increase graduation rates. Ideas being discussed are redesign of programs to reduce program length, improvement in course formats and number of course offerings, and offering certificates to enable student to complete degrees (or certificates) thus boosting the persistence and graduation rates.

Review of organizational commitment to continuing systematic quality improvement

In the Team's judgment, the Institution presented satisfactory evidence that it met this goal of the Quality Checkup. The institution's approach to the issue, documentation, and performance were acceptable and comply with Commission and AQIP's expectations.

Examples of commitment to quality improvement include:

- During the 2-day visit, the members of various constituents in the meetings were engaged in active participation. The participants shared ideas and information with the Team as well as with each other. All participants were open to the questions we raised and sought details when the Team made any suggestions. All these point to a strong and open organizational culture that is committed to systematic quality improvement.
- WNMU responded well to the ideas in the 2010 Feedback Report, participated in workshops to help them develop action plans for assessment plans and has used the lessons learned to evaluate and consider changes in its assessment plans. (WNMU just received the 2014 Feedback Report.)
- Discussions indicate that personnel at WNMU see the connections between its strategic planning process, action plans, and AQIP action projects.
- WNMU is making efforts to improve its reach to the market through the enhancements in its website and improved community and donor relationship.
- External constituents, including members of the BOR are actively involved in the strategic planning process and decisions relating to curriculum changes and student enrolment.
- At least one of its faculty members is involved in the New Mexico Quality Awards; this faculty member has been active in the decision-making processes discussed during our visit.

There are some concerns, however, that WNMU should address in the very near future:

Processes: While there are sections in WNMU where processes are documented and evaluated for improvement, the Institution should make a concerted effort to make the process view more systematic and systemic. The Team encourages WNMU to study, develop, and document its many processes, particularly those related to student learning (curriculum design, curriculum changes, program reviews, assessment process) as well as its overall decision-making process.

Measures: WNMU is starting to work on identifying measures and use data to guide decisions. The Institution should focus on developing a systematic decision-making process at all levels. As it develops and documents its processes, WNMU should focus clearly on the steps associated with determining the data that are used, evaluating the quality of such data, and ways to gather and assess output data from processes.

Champion / Leadership: Clearly administration, faculty, staff, and students are committed to WNMU's mission and actively participate in strategic initiatives. However, in order to improve and sustain an improvement culture, champions and cheerleaders are essential. WNMU should identify personnel in different units and at different levels to be champions and help bring the culture of continuous

improvement to all units and all process. One suggestion to identify and train these champions would be to have them involved in HLC and the AQIP process through attendance at the annual meetings and peer reviewer training.

Federal Compliance Worksheet for Evaluation Teams

Effective for visits beginning January 1, 2013

Evaluation of Federal Compliance Components

The team reviews each item identified in the Federal Compliance Guide and documents its findings in the appropriate spaces below. Generally, if the team finds in the course of this review that there are substantive issues related to the institution's ability to fulfill the Criteria for Accreditation, such issues should be raised in appropriate sections of the Assurance Section of the Team Report or highlighted as such in the appropriate AQIP Quality Checkup Report.

This worksheet outlines the information the team should review in relation to the federal requirements and provides spaces for the team's conclusions in relation to each requirement. The team should refer to the Federal Compliance Guide for Institutions and Evaluation Teams in completing this worksheet. The Guide identifies applicable Commission policies and an explanation of each requirement. **The worksheet becomes an appendix to the team's report.**

Assignment of Credits, Program Length, and Tuition

Address this requirement by completing the "Team Worksheet for Evaluating an Institution's Assignment of Credit Hours and on Clock Hours" in the Appendix at the end of this document.

Institutional Records of Student Complaints

The institution has documented a process in place for addressing student complaints and appears to be systematically processing such complaints as evidenced by the data on student complaints since the last comprehensive evaluation.

1. Review the process that the institution uses to manage complaints as well as the history of complaints received and processed with a particular focus in that history on the past three or four years.
2. Determine whether the institution has a process to review and resolve complaints in a timely manner.
3. Verify that the evidence shows that the institution can, and does, follow this process and that it is able to integrate any relevant findings from this process into its review and planning processes.
4. Advise the institution of any improvements that might be appropriate.

5. Consider whether the record of student complaints indicates any pattern of complaints or otherwise raises concerns about the institution's compliance with the Criteria for Accreditation or Assumed Practices.
6. Check the appropriate response that reflects the team's conclusions:
 - (X) The team has reviewed this component of federal compliance and has found the institution to meet the Commission's requirements.
 - () The team has reviewed this component of federal compliance and has found the institution to meet the Commission's requirements but recommends follow-up.
 - () The team has reviewed this component of federal compliance and has found the institution not to meet the Commission's requirements and recommends follow-up.
 - () The team also has comments that relate to the institution's compliance with the Criteria for Accreditation. See Criterion (insert appropriate reference).

Comments:

Additional monitoring, if any: None.

Publication of Transfer Policies

The institution has demonstrated it is appropriately disclosing its transfer policies to students and to the public. Policies contain information about the criteria the institution uses to make transfer decisions.

1. Review the institution's transfer policies.
2. Review any articulation agreements the institution has in place, including articulation agreements at the institution level and program-specific articulation agreements.
3. Consider where the institution discloses these policies (e.g., in its catalog, on its web site) and how easily current and prospective students can access that information.

Determine whether the disclosed information clearly explains the criteria the institution uses to make transfer decisions and any articulation arrangements the institution has with other institutions. Note whether the institution appropriately lists its articulation agreements with other institutions on its website or elsewhere. The information the institution provides should include any program-specific articulation agreements in place and should clearly identify program-specific articulation agreements as such. Also, the information the institution provides should include whether the articulation agreement anticipates that the institution under Commission review: 1) accepts credit from the other institution(s) in the articulation agreement; 2) sends credits to the other institution(s) in the articulation agreements that it accepts; or 3) both offers and accepts credits with the other institution(s).

4. Check the appropriate response that reflects the team's conclusions:

- (X) The team has reviewed this component of federal compliance and has found the institution to meet the Commission's requirements.
- () The team has reviewed this component of federal compliance and has found the institution to meet the Commission's requirements but recommends follow-up.
- () The team has reviewed this component of federal compliance and has found the institution not to meet the Commission's requirements and recommends follow-up.
- () The team also has comments that relate to the institution's compliance with the Criteria for Accreditation. See Criterion (insert appropriate reference).

Comments: WNMU has formal, written transfer policies and articulation agreements. Both can be found online and in print.

Additional monitoring, if any: None.

Practices for Verification of Student Identity

The institution has demonstrated that it verifies the identity of students who participate in courses or programs provided to the student through distance or correspondence education and appropriately discloses additional fees related to verification to students and to protect their privacy.

1. Determine how the institution verifies that the student who enrolls in a course is the same student who submits assignments, takes exams, and earns a final grade. The team should ensure that the institution's approach respects student privacy.
2. Check that any fees related to verification and not included in tuition are explained to the students prior to enrollment in distance courses (e.g., a proctoring fee paid by students on the day of the proctored exam).
3. Check the appropriate response that reflects the team's conclusions:
 - (X) The team has reviewed this component of federal compliance and has found the institution to meet the Commission's requirements.
 - () The team has reviewed this component of federal compliance and has found the institution to meet the Commission's requirements but recommends follow-up.
 - () The team has reviewed this component of federal compliance and has found the institution not to meet the Commission's requirements and recommends follow-up.
 - () The team also has comments that relate to the institution's compliance with the Criteria for Accreditation. See Criterion (insert appropriate reference).

Comments: Student verification for online courses occurs through a secure log in process through CANVAS. Each student who applies for admission is provided with a WMNU ID number which establishes unique user name and password.

Additional monitoring, if any: None.

Title IV Program Responsibilities

The institution has presented evidence on the required components of the Title IV Program.

This requirement has several components the institution and team must address:

- **General Program Requirements.** *The institution has provided the Commission with information about the fulfillment of its Title IV program responsibilities, particularly findings from any review activities by the Department of Education. It has, as necessary, addressed any issues the Department raised regarding the institution's fulfillment of its responsibilities in this area.*
- **Financial Responsibility Requirements.** *The institution has provided the Commission with information about the Department's review of composite ratios and financial audits. It has, as necessary, addressed any issues the Department raised regarding the institution's fulfillment of its responsibilities in this area. (Note that the team should also be commenting under Criterion Five if an institution has significant issues with financial responsibility as demonstrated through ratios that are below acceptable levels or other financial responsibility findings by its auditor.)*

Default Rates. *The institution has provided the Commission with information about its three year default rate. It has a responsible program to work with students to minimize default rates. It has, as necessary, addressed any issues the Department raised regarding the institution's fulfillment of its responsibilities in this area. Note for 2012 and thereafter institutions and teams should be using the three-year default rate based on revised default rate data published by the Department in September 2012; if the institution does not provide the default rate for three years leading up to the comprehensive evaluation visit, the team should contact Commission staff.*

- **Campus Crime Information, Athletic Participation and Financial Aid, and Related Disclosures.** *The institution has provided the Commission with information about its disclosures. It has demonstrated, and the team has reviewed, the institution's policies and practices for ensuring compliance with these regulations.*
- **Student Right to Know.** *The institution has provided the Commission with information about its disclosures. It has demonstrated, and the team has reviewed, the institution's policies and practices for ensuring compliance with these regulations. The disclosures are accurate and provide appropriate information to students. (Note that the team should also be commenting under Criterion One if the team determines that disclosures are not accurate or appropriate.)*

- ***Satisfactory Academic Progress and Attendance.*** *The institution has provided the Commission with information about policies and practices for ensuring compliance with these regulations. The institution has demonstrated that the policies and practices meet state or federal requirements and that the institution is appropriately applying these policies and practices to students. In most cases, teams should verify that these policies exist and are available to students, typically in the course catalog or student handbook. Note that the Commission does not necessarily require that the institution take attendance but does anticipate that institutional attendance policies will provide information to students about attendance at the institution.*

 - ***Contractual Relationships.*** *The institution has presented a list of its contractual relationships related to its academic program and evidence of its compliance with Commission policies requiring notification or approval for contractual relationships (If the team learns that the institution has a contractual relationship that may require Commission approval and has not received Commission approval the team must require that the institution complete and file the change request form as soon as possible. The team should direct the institution to review the Contractual Change Application on the Commission's web site for more information.)*

 - ***Consortial Relationships.*** *The institution has presented a list of its consortial relationships related to its academic program and evidence of its compliance with Commission policies requiring notification or approval for consortial relationships. (If the team learns that the institution has a consortial relationship that may require Commission approval and has not received Commission approval the team must require that the institution complete and file the form as soon as possible. The team should direct the institution to review the Consortial Change Application on the Commission's web site for more information.)*
1. Review all of the information that the institution discloses having to do with its Title IV program responsibilities.
 2. Determine whether the Department has raised any issues related to the institution's compliance or whether the institution's auditor in the A-133 has raised any issues about the institution's compliance as well as look to see how carefully and effectively the institution handles its Title IV responsibilities.
 3. If an institution has been cited or is not handling these responsibilities effectively, indicate that finding within the federal compliance portion of the team report and whether the institution appears to be moving forward with corrective action that the Department has determined to be appropriate.
 4. If issues have been raised with the institution's compliance, decide whether these issues relate to the institution's ability to satisfy the Criteria for Accreditation, particularly with regard to whether its disclosures to students are candid and complete and demonstrate appropriate integrity (*Core Component 2.A and 2.B*).
 5. Check the appropriate response that reflects the team's conclusions:

- The team has reviewed this component of federal compliance and has found the institution to meet the Commission's requirements.
- The team has reviewed this component of federal compliance and has found the institution to meet the Commission's requirements but recommends follow-up.
- The team has reviewed this component of federal compliance and has found the institution not to meet the Commission's requirements and recommends follow-up.
- The team also has comments that relate to the institution's compliance with the Criteria for Accreditation. See Criterion (insert appropriate reference).

Comments: Significant (not material) deficiencies were found in 2010 and 2013. Processes are in place that address and resolve these issues. A significant drop in financial reserves occurred from 2010 to 2013. Reserves were in excess of \$5M until 2013 when reserves dropped to \$1.7M. The state requires a 3% fund balance. The Vice President of Business Affairs explained the causes and is confident the 3% will be reached by the end of 2014. WNMU finances are generated at 65% state support and 35% tuition. In 2010, WMNU experienced a 25% spike in enrollment caused by layoffs in the mining industry. Consequently, 25% of the student population was not included in the state base funding. This issue resolved itself when the lag time for state funding was met. Further, fund balances were reduced with the expansion of the faculty in 2013. It was not expected that all searches would be successful. Five first year faculty have been non-renewed. The default rate as of July 2013 was 18.3%. As mandated by the federal government, stricter loan disbursement guidelines have been implemented. A contractual agreement is pending with HLC.

Additional monitoring, if any: None

Required Information for Students and the Public

1. Verify that the institution publishes fair, accurate, and complete information on the following topics: the calendar, grading, admissions, academic program requirements, tuition and fees, and refund policies.
2. Check the appropriate response that reflects the team's conclusions:
 - The team has reviewed this component of federal compliance and has found the institution to meet the Commission's requirements.
 - The team has reviewed this component of federal compliance and has found the institution to meet the Commission's requirements but recommends follow-up.
 - The team has reviewed this component of federal compliance and has found the institution not to meet the Commission's requirements and recommends follow-up.
 - The team also has comments that relate to the institution's compliance with the Criteria for Accreditation. See Criterion (insert appropriate reference).

Comments: Online and print publications provide consistent and accurate information.

Additional monitoring, if any: None.

Advertising and Recruitment Materials and Other Public Information

The institution has documented that it provides accurate, timely and appropriately detailed information to current and prospective students and the public about its accreditation status with the Commission and other agencies as well as about its programs, locations and policies.

1. Review the institution's disclosure about its accreditation status with the Commission to determine whether the information it provides is accurate and complete, appropriately formatted and contains the Commission's web address.
2. Review institutional disclosures about its relationship with other accrediting agencies for accuracy and for appropriate consumer information, particularly regarding the link between specialized/professional accreditation and the licensure necessary for employment in many professional or specialized areas.
3. Review the institution's catalog, brochures, recruiting materials, and information provided by the institution's advisors or counselors to determine whether the institution provides accurate information to current and prospective students about its accreditation, placement or licensure, program requirements, etc.
4. Check the appropriate response that reflects the team's conclusions:
 - (X) The team has reviewed this component of federal compliance and has found the institution to meet the Commission's requirements.
 - () The team has reviewed this component of federal compliance and has found the institution to meet the Commission's requirements but recommends follow-up.
 - () The team has reviewed this component of federal compliance and has found the institution not to meet the Commission's requirements and recommends follow-up.
 - () The team also has comments that relate to the institution's compliance with the Criteria for Accreditation. See Criterion (insert appropriate reference).

Comments: Accreditation information including portfolios and appraisals are found under the Accreditation tab on the WNMU home page.

Additional monitoring, if any: None.

Review of Student Outcome Data

1. Review the student outcome data the institution collects to determine whether it is appropriate and sufficient based on the kinds of academic programs it offers and the students it serves.
2. Determine whether the institution uses this information effectively to make decisions about academic programs and requirements and to determine its effectiveness in achieving its educational objectives.
3. Check the appropriate response that reflects the team's conclusions:
 - (X) The team has reviewed this component of federal compliance and has found the institution to meet the Commission's requirements.
 - () The team has reviewed this component of federal compliance and has found the institution to meet the Commission's requirements but recommends follow-up.
 - () The team has reviewed this component of federal compliance and has found the institution not to meet the Commission's requirements and recommends follow-up.
 - () The team also has comments that relate to the institution's compliance with the Criteria for Accreditation. See Criterion (insert appropriate reference).

Comments: Student learning outcomes are established and reviewed for academic programs. Further, retention, persistence, completion, and five-year program review data is collected and analyzed.

Additional monitoring, if any: None.

Standing with State and Other Accrediting Agencies

The institution has documented that it discloses accurately to the public and the Commission its relationship with any other specialized, professional or institutional accreditor and with all governing or coordinating bodies in states in which the institution may have a presence.

Important note: If the team is recommending initial or continued status, and the institution is now or has been in the past five years under sanction or show-cause with, or has received an adverse action (i.e., withdrawal, suspension, denial, or termination) from, any other federally recognized specialized or institutional accreditor or a state entity, then the team must explain the sanction or adverse action of the other agency in the body of the Assurance Section of the Team Report and provide its rationale for recommending Commission status in light of this action. In addition, the team must contact the staff liaison immediately if it learns that the institution is at risk of losing its degree authorization or lacks such authorization in any state in which the institution meets state presence requirements.

1. Review the information, particularly any information that indicates the institution is under sanction or show-cause or has had its status with any agency suspended, revoked, or terminated, as well as the reasons for such actions.
2. Determine whether this information provides any indication about the institution's capacity to meet the Commission's Criteria for Accreditation. Should the team learn that the institution is at risk of losing, or has lost, its degree or program authorization in any state in which it meets state presence requirements, it should contact the Commission staff liaison immediately.
3. Check the appropriate response that reflects the team's conclusions:
 - (X) The team has reviewed this component of federal compliance and has found the institution to meet the Commission's requirements.
 - () The team has reviewed this component of federal compliance and has found the institution to meet the Commission's requirements but recommends follow-up.
 - () The team has reviewed this component of federal compliance and has found the institution not to meet the Commission's requirements and recommends follow-up.
 - () The team also has comments that relate to the institution's compliance with the Criteria for Accreditation. See Criterion (insert appropriate reference).

Comments:

Additional monitoring, if any: None.

Public Notification of Opportunity to Comment

*The institution has made an appropriate and timely effort to solicit third party comments. The team has evaluated any comments received and completed any necessary follow-up on issues raised in these comments. **Note that if the team has determined that any issues raised by third-party comment relate to the team's review of the institution's compliance with the Criteria for Accreditation, it must discuss this information and its analysis in the body of the Assurance Section of the Team Report.***

1. Review information about the public disclosure of the upcoming visit, including sample announcements, to determine whether the institution made an appropriate and timely effort to notify the public and seek comments.
2. Evaluate the comments to determine whether the team needs to follow-up on any issues through its interviews and review of documentation during the visit process.
3. Check the appropriate response that reflects the team's conclusions:
 - (X) The team has reviewed this component of federal compliance and has found the institution to meet the Commission's requirements.

- () The team has reviewed this component of federal compliance and has found the institution to meet the Commission's requirements but recommends follow-up.
- () The team has reviewed this component of federal compliance and has found the institution not to meet the Commission's requirements and recommends follow-up.
- () The team also has comments that relate to the institution's compliance with the Criteria for Accreditation. See Criterion (insert appropriate reference).

Comments:

Additional monitoring, if any: None.

Institutional Materials Related to Federal Compliance Reviewed by the Team

Provide a list of materials reviewed here:

Student Handbook
2013-2014 Catalog
Board of Regents Manual
Transfer and articulation information
Student-Athlete Handbook
Campus Security Report
Equity in Athletics Disclosure
Discipline Accreditations

Appendix

Team Worksheet for Evaluating an Institution's Program Length and Tuition, Assignment of Credit Hours and on Clock Hours

Part 1: Program Length and Tuition

Instructions

The institution has documented that it has credit hour assignments and degree program lengths within the range of good practice in higher education and that tuition is consistent across degree programs (or that there is a rational basis for any program-specific tuition).

Review the "*Worksheet for Use by Institutions on the Assignment of Credit Hours and on Clock Hours*" as well as the course catalog and other attachments required for the institutional worksheet.

Worksheet on Program Length and Tuition

A. Answer the Following Questions

Are the institution's degree program requirements within the range of good practice in higher education and contribute to an academic environment in which students receive a rigorous and thorough education?

Yes No

Comments:

Are the institution's tuition costs across programs within the range of good practice in higher education and contribute to an academic environment in which students receive a rigorous and thorough education?

Yes No

Comments:

B. Recommend Commission Follow-up, If Appropriate

Is any Commission follow-up required related to the institution's program length and tuition practices?

Yes

No

Rationale:

Identify the type of Commission monitoring required and the due date:

Part 2: Assignment of Credit Hours

Instructions

In assessing the appropriateness of the credit allocations provided by the institution the team should complete the following steps:

1. Review the Worksheet completed by the institution, which provides information about an institution's academic calendar and an overview of credit hour assignments across institutional offerings and delivery formats, and the institution's policy and procedures for awarding credit hours. Note that such policies may be at the institution or department level and may be differentiated by such distinctions as undergraduate or graduate, by delivery format, etc.
2. Identify the institution's principal degree levels and the number of credit hours for degrees at each level. The following minimum number of credit hours should apply at a semester institution:
 - Associate's degrees = 60 hours
 - Bachelor's degrees = 120 hours
 - Master's or other degrees beyond the Bachelor's = at least 30 hours beyond the Bachelor's degree
 - Note that one quarter hour = .67 semester hour
 - Any exceptions to this requirement must be explained and justified.
3. Scan the course descriptions in the catalog and the number of credit hours assigned for courses in different departments at the institution.

- At semester-based institutions courses will be typically be from two to four credit hours (or approximately five quarter hours) and extend approximately 14-16 weeks (or approximately 10 weeks for a quarter). The description in the catalog should indicate a course that is appropriately rigorous and has collegiate expectations for objectives and workload. Identify courses/disciplines that seem to depart markedly from these expectations.
 - Institutions may have courses that are in compressed format, self-paced, or otherwise alternatively structured. Credit assignments should be reasonable. (For example, as a full-time load for a traditional semester is typically 15 credits, it might be expected that the norm for a full-time load in a five-week term is 5 credits; therefore, a single five-week course awarding 10 credits would be subject to inquiry and justification.)
 - Teams should be sure to scan across disciplines, delivery mode, and types of academic activities.
 - Federal regulations allow for an institution to have two credit-hour awards: one award for Title IV purposes and following the above federal definition and one for the purpose of defining progression in and completion of an academic program at that institution. Commission procedure also permits this approach.
4. Scan course schedules to determine how frequently courses meet each week and what other scheduled activities are required for each course. Pay particular attention to alternatively-structured or other courses with particularly high credit hours for a course completed in a short period of time or with less frequently scheduled interaction between student and instructor.
5. **Sampling.** Teams will need to sample some number of degree programs based on the headcount at the institution and the range of programs it offers.
- At a minimum, teams should anticipate sampling at least a few programs at each degree level.
 - For institutions with several different academic calendars or terms or with a wide range of academic programs, the team should expand the sample size appropriately to ensure that it is paying careful attention to alternative format and compressed and accelerated courses.
 - Where the institution offers the same course in more than one format, the team is advised to sample across the various formats to test for consistency.
 - For the programs the team sampled, the team should review syllabi and intended learning outcomes for several of the courses in the program, identify the contact hours for each course, and expectations for homework or work outside of instructional time.
 - The team should pay particular attention to alternatively-structured and other courses that have high credit hours and less frequently scheduled interaction between the students and the instructor.
 - Provide information on the samples in the appropriate space on the worksheet.

6. Consider the following questions:
- Does the institution's policy for awarding credit address all the delivery formats employed by the institution?
 - Does that policy address the amount of instructional or contact time assigned and homework typically expected of a student with regard to credit hours earned?
 - For institutions with courses in alternative formats or with less instructional and homework time than would be typically expected, does that policy also equate credit hours with intended learning outcomes and student achievement that could be reasonably achieved by a student in the timeframe allotted for the course?
 - Is the policy reasonable within the federal definition as well as within the range of good practice in higher education? (Note that the Commission will expect that credit hour policies at public institutions that meet state regulatory requirements or are dictated by the state will likely meet federal definitions as well.)
 - If so, is the institution's assignment of credit to courses reflective of its policy on the award of credit?
7. If the answers to the above questions lead the team to conclude that there may be a problem with the credit hours awarded the team should recommend the following:
- If the problem involves a poor or insufficiently-detailed institutional policy, the team should call for a revised policy as soon as possible by requiring a monitoring report within no more than one year that demonstrates the institution has a revised policy and evidence of implementation.
 - If the team identifies an application problem and that problem is isolated to a few courses or single department or division or learning format, the team should call for follow-up activities (monitoring report or focused evaluation) to ensure that the problems are corrected within no more than one year.
 - If the team identifies systematic non-compliance across the institution with regard to the award of credit, the team should notify Commission staff immediately and work with staff to design appropriate follow-up activities. The Commission shall understand systematic noncompliance to mean that the institution lacks any policies to determine the award of academic credit or that there is an inappropriate award of institutional credit not in conformity with the policies established by the institution or with commonly accepted practices in higher education across multiple programs or divisions or affecting significant numbers of students.

Worksheet on Assignment of Credit Hours

- A. Identify the Sample Courses and Programs Reviewed by the Team** (see #5 of instructions in completing this section)

Programs:

Masters of Social Work
Master's in Business Administration (online)
BFA Fine Arts
BS Early Childhood Education (NCATE accredited)
BS Nursing
BS/BA Environmental Sustainability
AAS Welding Technology (NCCER Certification)
AAS Computer Technology

Specific Courses:

Art 477: Seminar
Social Work 682: Advanced Field Practicum
Social Work 101: Introduction to Social Welfare and Social Work
Education 462/562: Field Experience Lab II
Student Success Seminar
Business 340: Principles of Marketing
Business 355: Communication in Business and Industry
Nursing 406: Critical Thinking in Professional Nursing
Nursing 270/272: Advanced Medical-Surgical Nursing
Cosmetology 183: Basic Techniques of Hair Styling

B. Answer the Following Questions

1) Institutional Policies on Credit Hours

Does the institution's policy for awarding credit address all the delivery formats employed by the institution? (Note that for this question and the questions that follow an institution may have a single comprehensive policy or multiple policies.)

Yes

No

Comments:

Does that policy relate the amount of instructional or contact time provided and homework typically expected of a student to the credit hours awarded for the classes offered in the delivery formats offered by the institution? (Note that an institution's policy must go beyond simply stating that it awards credit solely based on assessment of student learning and should also reference instructional time.)

Yes

No

Comments:

For institutions with non-traditional courses in alternative formats or with less instructional and homework time than would be typically expected, does that policy equate credit hours with intended learning outcomes and student achievement that could be reasonably achieved by a student in the timeframe and utilizing the activities allotted for the course?

Yes No

Comments: Not applicable

Is the policy reasonable within the federal definition as well as within the range of good practice in higher education? (Note that the Commission will expect that credit hour policies at public institutions that meet state regulatory requirements or are dictated by the state will likely meet federal definitions as well.)

Yes No

Comments:

2) Application of Policies

Are the course descriptions and syllabi in the sample academic programs reviewed by the team appropriate and reflective of the institution's policy on the award of credit? (Note that the Commission will expect that credit hour policies at public institutions that meet state regulatory requirements or are dictated by the state will likely meet federal definitions as well.)

Yes No

Comments:

Are the learning outcomes in the sample reviewed by the team appropriate to the courses and programs reviewed and in keeping with the institution's policy on the award of credit?

Yes No

Comments:

If the institution offers any alternative delivery or compressed format courses or programs, were the course descriptions and syllabi for those courses appropriate and reflective of the institution's policy on the award of academic credit?

Yes

No

Comments:

If the institution offers alternative delivery or compressed format courses or programs, are the learning outcomes reviewed by the team appropriate to the courses and programs reviewed and in keeping with the institution's policy on the award of credit? Are the learning outcomes reasonably capable of being fulfilled by students in the time allocated to justify the allocation of credit?

Yes

No

Comments:

Is the institution's actual assignment of credit to courses and programs across the institution reflective of its policy on the award of credit and reasonable and appropriate within commonly accepted practice in higher education?

Yes

No

Comments:

C. Recommend Commission Follow-up, If Appropriate

Review the responses provided in this section. If the team has responded "no" to any of the questions above, the team will need to assign Commission follow-up to assure that the institution comes into compliance with expectations regarding the assignment of credit hours.

Is any Commission follow-up required related to the institution's credit hour policies and practices?

Yes

No

Rationale:

Identify the type of Commission monitoring required and the due date:

D. Identify and Explain Any Findings of Systematic Non-Compliance in One or More Educational Programs with Commission Policies Regarding the Credit Hour