

Special Visit Final Report

Sofia University

WSCUC Special Visit

December 3-4, 2020

Combined Structural Change Follow-Up and Special Visit Site Team

The Special Visit team is comprised of the following members:

Dr. David Rosen, Team Chair, Past President, O'More College of Design

Dr. Carol Ann Gittens, Team Assistant Chair, Dean, Kalmanovitz School of Education, Saint Mary's College of California

Dr. Brian Shepard, Provost and Chief Academic Officer, University of Silicon Valley

Mr. Jeffery Keith, Team Member, Chair, Board of Trustees, Alliant International University

Dr. Mark Goor, Vice President, WSCUC, served as the staff liaison for Sofia University

The team evaluated the institution under the 2013 Standards of Accreditation and prepared this report containing its collective evaluation for consideration and action by the institution and by the WASC Senior College and University Commission (WSCUC).

The formal action concerning the institution's status is taken by the Commission and is described in a letter from the Commission to the institution. This report and the Commission letter are made available to the public by publication on the WSCUC website.

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SECTION I – OVERVIEW AND CONTEXT

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

Sofia University, originally founded in 1975 as the Institute of Transpersonal Psychology, is located in Palo Alto, California. In 2012, the institution changed its name to Sofia University and transitioned to for-profit status. As part of WSCUC reaffirmation of accreditation in July 2015, the Commission noted the promise of institutional stabilization from changing from non-profit to for-profit and the infusion of private capital by Sofia University, SPC. There was support at the time from the Commission for expanding academic mission to include business and technology studies (CAL_150715_SofiaU_AV.pdf). Accreditation was extended for a period of seven years, with an Offsite Review planned for fall 2021 and the Accreditation Visit in spring 2022. As part of the reaffirmation decision, WSCUC also issued a Notice of Concern, with a mandate for a Special Visit in fall 2016 to review progress in three areas: mission and vision; student success; and strategic planning. The Commission removed the Notice of Concern in July 2019 after the submission of a self-study report and a Special Visit conducted in April 2019. The Commission's action established the requirement and timeframe for an Interim Report in May 2020 and confirmed the previously established schedule for reaffirmation.

With the structural changes that led to expanded academic offerings in business and technology, Sofia University remains committed to its founding principles of humanistic and transpersonal psychology. Sofia University currently offers nine degree programs: two bachelor's completion degrees (BA in Psychology, BS in Business Administration); five master's degrees (MA in Counseling Psychology, MA in Transpersonal Psychology, MBA, MBA-Chinese language, MS in Computer Science); and two doctorates (PhD in Transpersonal Psychology, PsyD in Clinical Psychology). All programs, except the BA in Psychology and PsyD, are approved by WSCUC for both campus and distance/online delivery. In 2019, Sofia University

received substantive change approval for the development of a branch campus in Costa Mesa, California. At this time, enrollment of students has not officially commenced at the Costa Mesa campus.

In October 2018, Sofia submitted a request to WSCUC for approval of a Change in Ownership to Beitou Holdings (Canada) Ltd., a British Columbia company. The Commission elected to defer a decision on the matter at both its November 2019 and February 2020 meetings pending receipt of supplemental information. After the February 2020 meeting, WSCUC issued a Commission Action Letter that included a notification of a Warning for a failure to timely disclose or seek advance approval of the transfer of Sofia University, SPC stock to Education First, LLC. Sofia subsequently submitted a Request for Review of the WSCUC Warning. In May 2020, at the Commission's suggestion, Sofia submitted a supplement to the Beitou Change of Ownership document. The Structural Change Committee on June 22, 2020 met with institutional representatives and reviewed materials submitted by Sofia that clarified the set of transactions and addressed the impact of this set of transactions on institutional control, governance and finances. The Structural Change Committee referred to the full Commission its recommendation that the change be approved and the Warning be removed. The Commission acted at its June 2020 meeting to receive the Structural Change Committee recommendation and approve the proposed Change of Ownership to Beitou Holdings (Canada), Ltd. It removed the Warning and affirmed the expectation for a Special Visit in fall 2020 as requested in a February 26, 2020 Commission Action Letter from WSCUC President Jamienne Studley. That letter required a Special Visit in fall 2020 to address a) board governance, b) leadership transition, c) enrollment, and d) the impact of these on academic offerings.

Because of the change of ownership, the visit conducted from December 3-4 2020 included items relevant to both the special visit and to the structural change post-implementation visit. The scope of the Special Visit to Sofia University on December 3-4, 2020, was summarized in a July 8 2020 letter sent to the institution by WSCUC Vice President and Institutional Liaison Mark Goor. The visit was to include progress

on topics from the Interim report and issues listed in the request for the Special Visit as well as Structural Change Post-Implementation areas of inquiry. The following eight areas of focus were enumerated and organized as follows:

Part 1: Post Implementation / Structural Change

1. Enrollment for fall 2020 with enrollment trends for two years
2. Status of board of trustees development and board operations such as committee structure, regular meetings, minutes with decisions, self-assessment of board effectiveness and other good practices, and incorporation by board and senior management of WSCUC communication and integrity policies
3. Financial update, including review of audits that were provided with the Interim Report

Part 2: Special Visit Interim Report

4. Update on implementation of the strategic plan
5. Description of leadership transitions since the 2019 Special Visit
6. Status of IR and assessment of student learning
7. Analysis of changes on academic offerings
8. Status of state authorizations to offer programs in other states

B. Description of Team's Review Process

Due to Coronavirus COVID-19 Response restrictions on travel and social gatherings in California during the fall of 2020, the WSCUC Special Visit team conducted a virtual site visit. Prior to the December virtual visit, team members reviewed Sofia University's self-study and shared initial observations related to the WSCUC eight focus areas. They also completed the team worksheet to serve as a guide to the visit.

Team members noted the importance of engaging in inquiry around several areas: They refined the list of individuals and groups from Sofia University to interview, and finalized the visit schedule. The team was thus prepared and convened via video-based, web-conferencing for the special visit from December 3-4, 2020.

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

The report submitted by Sofia University for the Special Visit comprised two parts. Part A consisted of responses to the eight topics of the Special Visit and included references to Part B of the report, which consisted of responses to the Action Letter from WSCUC President Jamienne Studley (February 26, 2020) on topics relevant to the Structural Change Post-Implementation Visit. In some cases, such as Board development and organization, the entire response to the topic appeared in Part B and Part A directed the reader to that section. For discussion of enrollment and finance, however, Part A did not refer the reader to Part B where other relevant information could be found. Not only were the two parts only loosely connected, the answers on Board development in Part B did not address all the issues under review in the visit. In particular, neither Part A nor B addressed "incorporation by board and senior management of WSCUC communication and integrity policies," which appeared in the July 8, 2020, letter to Sofia and which Sofia's Special Report noted as necessary to address (p. 1). During the virtual visit, the team asked about this omission, Sofia was not able to give a reason for not having answered, provide a response relevant to the item, or show knowledge of the CFRs relevant to that item (i.e., CFRs 1.3-1.8).

In general, the team found that the information provided in the report frequently lacked clear organization, clear analysis, and ample and relevant supporting evidence. "Description of leadership transitions since the 2019 Special Visit" (SV Report, 2020, pp. 9 – 11) provided a clear narrative regarding those who left and the reasons for the change. It did not, however, provide any information about how the responsibilities of those who departed are currently carried out in the university. For instance,

although the report notes the departure of the Vice President Human Resources, it does not mention who took over the responsibility of that position. The one piece of evidence provided about the change in leadership, the most recent organizational chart, had no mention of human resources. In the case of “Status of state authorizations to offer programs in other states,” important information relevant to the topic occurs at the end of the document rather than in the relevant section, and in the case of the Strategic Plan, although progress is noted in the narrative, no evidence is provided that connects the narrative to the plan. In many cases, evidence could not be provided because it did not exist. As in the case of the Strategic Plan update, the amount of work that the small Sofia team has undertaken in order to stabilize the institution had not permitted an update of the plan. In the case of the missing audited financials, which are required for the change of ownership, the document was in preparation but not completed. In those and other cases, when supporting documents were not available, Sofia’s narrative should have included information regarding the status of those documents.

Finally, during the visit the team discovered that among those helping to prepare the report were the lawyers for the investment group, although the report made no mention of that involvement. The team understood as well that the legal team had a role in deciding what information Sofia should present in the report and how it should be presented (CFRs 1.5, 1.8). Putting aside other considerations of CFRs 1.5 and 1.8, the team felt that the Special Report seemed to be written like a compliance report rather than as a report about continuous improvement aimed at helping the university achieve sustainability. The team suggests that while the involvement of the investment group’s legal team is understandable and useful within limits, that involvement may contribute to the poor quality of the report in presenting a clear picture of the university and may also obstruct an understanding of the purposes of WSCUC accreditation and the required reviews. While the report had major defects, the team also believes that the report does not reflect any intention of dishonesty (CFR 1.8), but that it is the result of constrained

time and pressing operational demands, along with a limited understanding of WSCUC's purposes and processes.

SECTION II – EVALUATION OF ISSUES UNDER THE STANDARDS

The Evaluation of Issues under the Standards section of this Special Visit Team Report addresses the eight (8) areas of focus summarized in the July 8, 2020 letter from WSCUC Vice President Mark Goor. The discussion is further organized into two sections. Part 1 considers the evidence pertaining to three topics relevant to Structural Change Post-Implementation as identified in the Action Letter from WSCUC President Jamienne Studley (February 26, 2020). These include enrollment trends, board development, and institutional finances. Part 2 addresses five additional topics relevant to the Special Visit as identified for further consideration by the July 12, 2019 Commission Action Letter. These include update on implementation of the Strategic Plan, Leadership transitions, assessment of student learning and program review, IR capacity, academic offerings and growth, and an update on state authorizations.

Part 1: Post Implementation / Structural Change

Issue 1: Enrollment for fall 2020 with enrollment trends for two years (CFR 3.4)

One of the first and primary areas for the Special Visit cited by the Commission Action Letter dated July 8, 2020 is enrollment for fall 2020 with enrollment trends for two years. Sofia University's revenue is driven one-hundred percent by student tuition; therefore, the trends in enrollment become critical for the institution's financial sustainability (CFR 3.4). The university has seen trends in recent years of declining enrollments and credit hours taken across all programs. The total number of credit units generated peaked in the fall of 2018 at 1,594. There was a rapid decline in enrollment with a low point of 880 credit units generated in the summer of 2019. There has been a renewed focus concerning programs, marketing and enrollment over the past 12 months with changes in the Board of Trustees, president and enrollment/marketing leadership. Sofia commissioned a comprehensive market review of its programs,

competitors and future program growth areas. The study was conducted by Stamats, a market study firm with deep experience in higher education. The goal of the market study was to find points of improvement for each of Sofia's eight academic programs to grow more interest from students, create stickiness to Sofia's website, and ultimately increase enrollment. Individual program demand assessments were measured against national, state, and local trends. In total, 24 competitor programs were reviewed. Amongst the areas reviewed included:

- Program name
- Accreditation beyond regional accreditation body for higher education
- Awards or enrollment figures (either from IPEDS or from data provided on institutional website)
- Delivery, time to degree
- Entry requirements, start dates
- Curriculum, capstone/dissertation/internship/practical, tracks of study
- Tuition, aid/scholarship
- Intended audience (explicit or implicit from website content)
- Promotional tactics observed (calls to action, events, testimonials, videos, etc.).

The study was completed on September 9, 2020 and identified several areas of actionable improvement.

Sofia has started to implement many of the recommended actions of the study. This includes:

- Overhaul and rewrite program content on the website
- Creation of new content including blogs, alumni features/spotlights/testimonials
- Creation of video content from faculty
- Optimize the website for mobile and desktop use
- Overall backend enrollment improvements

- Increase marketing spend

Some of the changes have led to increased demand for current Sofia programs. For the fall of 2020, credit hours generated have increased overall by 18.5% from the fall of 2019, which has led to a more sustainable level of revenue for the institution. The focus on domestic enrollment (and increased credit hours generated) is occurring at the same time as the Mandarin Language MBA program continues to experience robust growth.

Sofia's Mandarin Language MBA is a high-quality innovative degree program in partnership with Tsinghua University, which is one of the top universities in China. The program is run through the university's Global Campus, which is also tasked with creating partnerships with other Chinese universities for short-term content. The current MBA partnership was just renewed for another 5 years, which will provide additional financial resources for Sofia. The MBA program has seen credit hour generation go from 3,078 in the fall of 2018 to 5,180 in the fall of 2020, which is an increase of 68%. The Global Campus team expects to add 200 new enrollments per quarter for the foreseeable future. Sofia continues to work on other partnership models similar to the Tsinghua partnership and expects to sign another one by the end of 2020. Overall, the university is demonstrating positive trends in credit hours generated/enrollment and is executing on the key marketing and enrollment tactics necessary for growth and financial sustainability (CFR 3.4).

Issue 2: Status of Board of Trustees Development and Board Operations (CFRs 1.5, 1.8, 3.9)

The July 8, 2020 Commission Action Letter sent to Sofia University by WSCUC President Jamienne Studley, stated that "That Institutional Report and the Special Visit will address . . . [s]tatus of board of trustees development and board operations such as committee structure, regular meetings, minutes with decisions, self-assessment of board effectiveness and other good practices, and incorporation by board

and senior management of WSCUC communication and integrity policies.” The team reviewed the October 1, 2020 Special Visit Report submitted by Sofia University, as well as all exhibits. The team conducted remote interviews with board members, campus leadership and other groups throughout the university relevant to board development and operations.

The Special Visit team observed that Sofia has made significant improvements in board development and operations (CFR 1.5, 1.8, 3.9). On September 20, 2020, the board adopted bylaws that clearly state the appropriate scope and powers of the university’s board in alignment with WSCUC’s policy recommendations (CFR 1.5, 1.8, 3.9). In accordance with its new bylaws, the board has created charters for essential committees, such as Student and Academic Affairs and Finance, and those committees have begun to meet. While minutes demonstrate that the committees are fully operational, the minutes differ in form from committee to committee and even meeting to meeting, are uneven in detail, do not include approval of minutes of previous meetings, and do not consistently indicate the specifics of motion approvals. For instance, the Academic and Student Affairs Committee had notes of its July meeting without any motions, while the January minutes consisted of a bulleted list of topics. In contrast, the Finance Committee minutes include discussion associated with each topic and motions identified by mover and second. The Board meeting minutes, in distinction to the records of both committees, are clear, concise, and complete. They offer a model for the committees to follow. Regardless of their formal defects, the records of meetings show that the committees function effectively. In its interview, the board members stated that the committees improved the board’s work and that the new bylaws allowed the board greater exercise of its fiduciary responsibilities.

The Sofia board has created a manual and anticipates training for its members. It also has developed a cogent conflict of interest disclosure policy and process. The board has defined performance for its members and developed tools for evaluating performance, which it has already begun to use. Sofia shared

with the team both the new instrument and the results of the first completed survey. It is noteworthy that the analysis of the results tended to overstate positive aspects of some of the data while downplaying others. For instance, the assessment of the data finds that “there is less certainty” about the chair’s support for board members’ continuing education about university issues (Report, p. 1; evaluation question 8), whereas the data indicates a clear deficiency (Report, second appendix [unmarked]). However, interviews with the Board show the Board’s clear recognition of the deficiencies and a clear intent to correct them, regardless of the language of the written analysis. The team observed not only a commitment to continuous improvement concerning their own performance but also a commitment to the use of data for decision-making and continuous improvement in all areas of the university (CFRs 3.7, 4.1, 4.3).

The team found that the board has developed and is effectively using WSCUC required policies and procedures (CFR 1.5, 1.8, 3.9). Members clearly recognized their responsibilities, along with the power of strong policies and processes to aid their work. That is, they are using the requirements and best practices to enhance their effectiveness and the effectiveness of operations at Sofia. Members understand that to be successful the university will need to achieve its revenue goals while tying budget to strategy. They also understand that Sofia will only be as strong as its ability to assure students that the education they receive is effective, allowing them to reach graduation with competencies and skills that aid success after graduation.

The team found the board to be highly qualified and highly engaged. The board is a strong asset during the current period when the university seeks to become stable and to establish systems that assure both educational success and future stability. When Sofia files its next report, the team expects to find greater maturity in the board’s use of its policies and procedures, its assessment, and its training and

development. It also expects to see additional evidence of connecting budgets with the institution's strategic plan and of a strengthening relationship with faculty in regard to student learning.

Issue 3: Financial Update Including Review of Audits Provided with Interim Report (CFRs 3.4, 3.8)

Another focus of the Special Visit included a financial update, including review of audits that were provided with the Interim Report (CFR 3.4). The audits for the last two years were reviewed including balance sheets, statements of operations and accumulated deficit, cash flows and the related notes to the financial statements. The audits reviewed included the one for Fiscal Year ending June 30, 2018 and Fiscal Year ending June 30, 2019 (the June 30, 2020 audit report was not completed as of the date of the Special Visit). The audits were conducted in accordance with auditing standards generally accepted in the United States of America and the standards applicable to financial audits contained in *Government Accounting Standards*, issued by the Comptroller General of the United States. In the 2019 audit there was found to be a significant deficiency in the internal controls of financial reporting which had to do with the recording of the pre-payment of tuition for the Chinese MBA program. Sofia corrected this issue and has made the necessary changes in order to be certain this does not happen again.

For fiscal year ended June 30, 2019 Sofia had a net loss due to the lack of expense control and declining revenue. For fiscal year ending (FYE) June 30, 2020 the institution experienced further revenue loss. In order to support the university, the shareholder provided a \$5 million line of credit. As of the end of fiscal year 2020 there were funds to draw on. As part of the efforts to continue supporting the university the shareholder decided to make a long-term commitment to the university by converting to equity (CFR 3.4).

Sofia has recently hired an experienced CFO who has created a robust and inclusive budgeting process that includes a multi-year forecast (CFR 3.8). The CFO has worked with the Cabinet to institute

expense and hiring controls in order to create an alignment between revenue and expenses. The result is the institution is projected to reduce the net loss in FYE June 30, 2021 (with revenue increasing). For FYE June 30, 2022 revenue is projected to increase. The assumptions in the pro forma seem reasonable with modest domestic revenue growth and supportable Chinese MBA program growth. The final year of the projection (FYE June 30, 2023) shows revenue increasing. The dramatic improvement can be shown in multiple areas. For example, the percentage of revenue coming from domestic programs is projected to decrease from FYE June 30, 2020 to FYE June 30, 2023. Additionally, salary and benefits are projected to go from an unsustainable level in FYE 2020 to a sustainable level in June 30, 2023.

Part 2: Special Visit Interim Report

Issue 4: Implementation of the Strategic Plan (CFRs 2.10, 2.11, 3.1, 3.5, 4.1, 4.2, 4.3, 4.6)

In January of 2019 the board reviewed and approved the strategic plan for the university. The plan proposes a five-year roadmap in key strategic areas: academic excellence, academic infrastructure and technology, enrollment management, financial health and student services/one university: two campuses (CFRs 2.10, 3.1, 3.5, 4.1, 4.2, 4.3, 4.6). As originally published, the plan outlined strategic directions in all of these areas, a sparsely detailed list of outcomes that are primarily procedural and operational, and staff assigned to roles and responsibilities. The plan reflects an awareness of best practices in higher education and the direction Sofia should take to achieve those practices. The creative use of the mission-aligned Maslow's Hierarchy reflects the institution's commitment to transpersonal psychology and humanistic education, resonates with the Sofia community, and provides structure from which to prioritize initiatives.

The Introduction to the 2019-23 Sofia University Strategic Plan promises detailed work for an annual plan through 2019, that would be "reviewed, updated, and fully populated with detail regularly

for all subsequent years” (Appendix 23, “Sofia University Strategic Plan FINAL_01.24.19”, p.3). The 2019 foci, measures and implementation plan were appropriate for an institution with limited academic infrastructure, emerging financial stability, and early adoption of baselines and targets (e.g., enrollment targets, faculty development planning, faculty hiring). As of this site visit, the plan remains largely aspirational and has not been noticeably updated since original publication. From the five strategic directions, the plan moves abruptly to a limited list of necessary and immediately implementable policy and operational changes. Timelines are vague, and measurable outcomes with identified evidence in support of those outcomes are often missing or incomplete. Staff roles, including the Vice President Human Resources and the Vice President Marketing and Recruitment have been consolidated or eliminated since 2019 but the responsibilities of the planning process have not been recognized as reassigned (CFR 3.1).

The team reviewed the Sofia University Interim Report of June 1, 2020 and Special Visit Report of October 1, 2020, with all exhibits, conducted interviews with the board of trustees, campus leadership, the current Strategic Planning Committee, as well as faculty leaders regarding the implementation of the strategic plan. A number of examples were provided in Sofia University’s June 1, 2020 Interim Report as fully or partially completed evidence of plan implementation in Year 1 (2019-20). These included a draft academic plan with preliminary funding for the hire of a Director of Education and large-scale efforts toward curriculum revisions and program development (App. 17, “Academic Master Plan.”). Also noted in that interim report was the refocusing and new Charters for the Faculty Senate and the Provost’s Council to “clarify decision-making responsibilities across institutional stakeholders and define how the university engages in shared governance.” (CFR 3.7, 4.6). These examples of successful implementation of the strategic plan were reiterated and expanded with two additional examples in the October 1, 2020 Special Visit Report. Additional evidence included facilities and technology upgrades at the Costa Mesa and Palo Alto campuses (CFR 3.5). Further, in fall 2019, the writing support services function was

relaunched as the Virtual Writing Lab (VWL). In interviews with the Site Visiting team, the faculty proudly embraced the VWL as evidence of a student-centered collaboration that engaged the faculty and strengthened morale (CFRs 2.10, 2.13).

The site visit team learned during the campus interviews that faculty and administrative leaders alike viewed the success of the strategic plan to be mutually dependent upon enrollment growth and financial stabilization. Though none of the members of the current Strategic Planning Committee were in their institutional leadership roles during the time of its inception, the members expressed a shared valuing and enthusiastic commitment to the strategic planning process and ongoing monitoring of their efforts. Campus leaders expressed sincere commitment to the success of the strategic plan, and the opportunity to use the plan's initiatives to sustain faculty engagement and build morale. Nevertheless, the team noted the expression of fatigue from endeavoring to meet regulatory requirements and the significant leadership transitions in recent years, and efforts to implement the strategic plan and the anticipation of a search for a permanent president. The visiting team observed an overall campus community willingness, expressed during interviews, to refresh and update the strategic plan, particularly in anticipation of the search for a permanent university President.

The site visit team recognizes Sofia University's strong institutional commitment to the essential mission and vision as expressed through the strategic plan. Sofia has a well-informed board from a higher education standpoint that understands the synergistic nature of strategic planning, continuous improvement aimed at helping the university achieve sustainability, and academic excellence. Furthermore, the visiting team concurs that regardless of the varying levels of detail, and inconsistencies of form within the plan, there is ample evidence of reflection, discussion and collaboration that went into its development. Faculty and institutional administrators alike recognize the plan as a useful guide to move the institution forward. The team was impressed with how the strategic plan has served as a tool

for helping to build a more collaborative culture at Sofia. Faculty were pleased with this work around student learning outcomes assessment led by the Provost's Academic Master Plan.

During the site visit, the plan was viewed as a useful framework for developing annual goals, helping to prioritize efforts and focus energies into the more immediate needs of the institution. The team observed that strategic planning provides yearly goals in terms of campus-wide, annual organizational, financial, enrollment focused initiatives. What was less clear is how the President's Annual Goals, the Academic Master Plan, and the Enrollment and Marketing planning process are aligned with the strategic plan. There is disconnect between the discussion of two campuses (referencing the new campus in Costa Mesa) and student engagement via campus and co-curricular programming and Sofia's rapidly increasing, largely online international student body (CFR 2.10, 2.11). The team observed very little in the way of metrics or KPIs to show concrete movement toward goal completion. For example, the visiting team would have appreciated seeing the goals listed in a comprehensive table that included progress on each reported item. The team urges Sofia to develop evidence-based milestones and metrics that reflect an integration of campus-wide, annual organizational, financial, enrollment focused planning, and that are regularly documented and communicated to stakeholders. In this way, the university will be better positioned to support, assess and demonstrate a successful implementation and realization of strategic goals.

Issue 5: Description of Leadership Transitions since the 2019 Special Visit (CFRs 1.8, 3.7, 3.8, 3.10)

Since 2019, leadership has undergone significant changes. On March 6, 2020, the Board accepted the resignation of the then president and appointed an acting president, a former university CEO who had served as Secretary to the Sofia Board from 2018 until the appointment. The Board immediately

established a presidential search committee but suspended the search because of Covid-19. That search has yet to be renewed and no advertising or other materials have been prepared for its re-launch.

In the summer, under the new president, a number of executives resigned or were terminated, including the Vice President Human Resources, the Vice President Marketing and Recruitment, and the Vice President Global Strategy and Operations. The president assumed direct executive responsibility for marketing and recruitment, with directors of those areas reporting directly to him. In addition, the Board created a new Global College, whose director reports directly to the president. It is noteworthy that the director of the Global College has three direct reports who are identified only by name and not by title or function in the current organizational chart. Responsibility for human resources is now under the CFO and currently has no director, although the Chief of Staff serves without title in that role and the organizational chart contains no indication of that area reporting to the CFO. While the CFO was hired in accordance with recommendations of the Commission and requirements of the accreditation standards (CFR 3.8), all other changes occurred either to save cost or as part of a strategy to enhance revenue.

Based on the institutional report and interviews, the overriding consideration in leadership transitions was CFR 3.7: “Clear, consistent decision-making structures and processes.” Sofia has created a lean organization in which functions are scattered across many related areas and each administrator plays multiple roles. From a financial perspective, the transitions seem sensible, and the new organization seems to be effective in its current form. However, the team noticed potential problems for the future (CFR 3.7). First, in the current model of dispersed responsibility, breakdown of internal communication could damage effectiveness. For instance, marketing and recruitment for domestic programs have no connections with marketing and recruitment for international programs. In addition, faculty in domestic programs seem disconnected from oversight of the international programs, which appear to have their own faculty (CFRs 2.1, 2.4. 3.10). Other such fragmentation is noted throughout the report. Integration

and alignment of all related operational areas may be impossible given the current exigencies of Sofia's situation; however, robust communication among related areas is necessary until fuller integration occurs. Second, the pruning of personnel, the lack of clarity in the organizational structure, and the low level of communication in and among various operational areas may lead to anxiety and even anomie. The institution currently has much energy, but the team observed a level of discomfort below the surface that revealed itself in remarks in which individuals felt uncertain about whether their positions might be cut or whether actions taken by a group would be recognized or acted on in other areas of the university.

Fixing the problems noted above will take time and thoughtfulness on the part of the administration and board. Some concerns will be mollified as aspects of the strategic plan are integrated and as the Board develops a stronger relationship with the faculty. Retaining the current board and administrative team, however, provides an immediate way to achieve more certainty and stability. Although the university reported that it would re-start the presidential search post-Covid-19, the board admitted in its interview that it would like to retain the current president until enrollment stabilizes, revenue goals are reached, and sustainable systems have been put into place. The team agrees with this plan. The team believes that Sofia has the right president, right senior team and right board for its current transitional period. If the board should take the decision to defer the search, however, they would need to make the reasons for that decision clear to the community and to the commission when Sofia files its next report (CFR 1.8). The team also cautions that clear lines of authority and clearer decision-making processes are required (3.7).

Issue 6: Status of IR, Assessment of Student Learning & Program Review (CFRs 2.3, 2.4, 2.6, 2.7)

The February 26, 2020 Commission Action Letter from WSCUC President Jamienne Studley required the institution to: "Provide evidence of academic excellence through assessment of student learning

outcomes and program review, making the process consistent across the institution. This includes codifying the process of program review (CFRs 2.3, 2.4, 2.6, 2.7).” The team read the interim and special visit reports (June 1, 2020 and October 1, 2020) with appendices provided by the institution and conducted visit interviews with special attention paid to student learning outcome assessment and program review.

Following a Special Visit April 1–4, 2019, the Commission indicated concerns about the institution’s learning assessment and program review process. The previous visit noted that Sofia’s process of assessment was in the “beginning stages.” The current visit team found that the assessment and program review process is growing, but still has significant gaps in both documentation and process. Under the leadership of their new CAO, Sofia has begun a comprehensive process of creating and codifying learning outcomes for individual programs as well as for the entire institution. Many of the previous learning outcomes have been rewritten to make them more measurable. Faculty members actively participated in developing the framework for a program review process and in defining the various learning outcomes and measurement rubrics needed to conduct assessment and program review. In discussions with faculty members who were involved in the initial round of program review development, they expressed great enthusiasm for a process they felt was long overdue.

In the fall of 2019, Sofia hired a curriculum consultant to assist programs in reworking their Program Learning Outcomes (PLOs). This resulted in rewriting many of the PLOs to make them more measurable. As noted in the October 1, 2020 self-study, “Programs were encouraged not to change outcomes, but rather restate them in a form that identified a clear and demonstrable skill, knowledge set or activity that lent itself to measurement.” While the team lauds making learning outcomes observable and measurable, they had concerns that the restriction to not change outcomes may have prevented true evaluation of the quality and relevance of the learning outcomes.

The self-study also indicates that courses were mapped to relevant outcomes and that an assessment rubric was developed for selected outcomes. The team was able to see appropriate evaluation rubric matrices for some PLOs in several programs, however, was not able to see the map of courses to outcomes. The team also did not see evidence of a plan or process to ensure teaching faculty incorporated the respective learning outcomes into their classes and curricula.

The team noted that one of the primary artifacts used to evaluate PLOs was a type of Capstone project. In discussions with the team during the visit, some faculty expressed concern that for programs that are primarily clinical in nature a capstone project may not capture evidence of the most important learning outcomes in those programs. It was noted in the Combined Assessment Reports and Proposals document that many students who were strong in the clinical aspects of their program performed poorly on the artifact chosen for assessment. The team was pleased to see a more structured approach to evaluating artifacts with an appropriate rubric but was concerned that some of the evaluated artifacts may not truly represent the expected learning outcomes for the respective programs.

The greatest concern noted by the team was the lack of a cohesive, well-documented, and overarching program review process that is conducted on a regular and repeating schedule and that provides adequate feedback to academic leadership and helps ensure faculty incorporate the expected CLOs, PLOs, and ILOs into the curriculum. While six of the programs performed an initial review during the past year, there does not appear to be a timetable for the remaining program reviews nor for a thorough review of those six initial review findings with academic leadership.

The team notes the progress that has been made since the previous special visit in developing rubrics for evaluating learning outcomes as well as the enthusiastic support of assessment and program review among the faculty and administration of Sofia University. There is, however, still much to be done to satisfy the WSCUC standards regarding Achieving Educational Objectives Through Core Functions (CFRs

2.3, 2.4, 2.6, 2.7) and Creating an Organization Committed to Quality Assurance, Institutional Learning, and Improvement (CFRs 4.1, 4.2, 4.3, 4.4).

The faculty and administration of Sofia University are urged to continue building on the program review and assessment process already underway to create and document a cohesive and comprehensive process that ensures:

- CLOs, PLOs, and ILOs are connected in measurable ways;
- Faculty incorporate the learning outcomes into the curriculum;
- Appropriate artifacts and rubrics are used to measure outcomes;
- The review process is understood by all involved and conducted on a regular and recurring basis;
- The data from the review are readily available to, and acted upon, by academic leadership to foster continual improvement in educational outcomes.

Issue 7: Analysis of Changes / Impact on Academic Offerings (CFRs 2.1, 2.3, 2.4, 3.10, 4.1, 4.3)

Sofia University is undergoing substantial change as an institution. Following a Structural Change proposal for change of ownership, the Commission scheduled the December 3-4, 2020 special visit to, among other things, examine the impact of those changes at the University on current and planned academic offerings. In order to grow and be successful, Sofia aspires to offer a suite of academic programs that are attractive to students, academically sound, appropriate to the institution's mission and capabilities, and fiscally feasible. As the institution evaluates its academic offerings the Commission wants to ensure it is doing so with data-driven research and analysis and with robust faculty oversight that ensures offerings and learning outcomes remain appropriate to the disciplines, degree levels and the university's mission (CFRs 4.1, 4.3).

Sofia recently engaged Stamats Communications, a full-service market research company, to assess the marketplace competitiveness of its current program offerings. The data from that report focus almost exclusively on a marketing analysis of website content from Sofia and competitor programs and offer little by way of comparison to the structure and content of the actual programs other than cost and time/residency requirements. While those data may not provide much guidance for the development and modification of academic offerings, the marketing advice may prove extremely valuable for helping the current programs reach a larger target audience.

Based on both anecdotal evidence and its own marketing research, Sofia made the decision to enroll a second cohort in its MA in Counseling Psychology (MACP) program beginning with the winter term in 2021. This program has traditionally started only one cohort per year beginning with the fall term. In order to improve the efficiency of the 2nd cohort start, the MACP Program Director made adjustments to the initial sequence of courses for the program to maintain sufficient enrollment in the individual classes. The overall curriculum did not change, only the order in which some of the classes and the residential intensive experience occur.

A second change involved the decision to “pause” admission to the PsyD in Clinical Psychology program. That program has seen a steady, and significant, decline in enrollment over the past decade and has been put on hold pending review of the marketing analysis. The October 1, 2020 special visit report indicates that the program is not in a “teach out” status but has put new admissions on hold while it develops a long-term plan for the program. In discussions with faculty, several mentioned their disappointment with the decision to pause the program and a concern that the decision was strictly financially motivated and did not involve substantial academic input and consultation.

A significant bright spot in Sofia’s academic programs is the rapid growth in international enrollment in the online, Chinese language MBA program. Due, in large part, to a collaboration with Zejing

Education and Tsinghua University in China, Sofia has experienced a nearly 4-fold increase in Chinese MBA students in the last few years. This increased enrollment not only helps the financial outlook of Sofia it provides a counterbalance to the drop in domestic tuition due to the declining numbers of US students enrolling at the university.

Sofia has created an office called The Global College that reports directly to the Acting President. This office is tasked with developing additional academic offerings for students outside of the US. In interviews with faculty members, concern was expressed that they were being pressured to develop programs for this office that did not meet institutional learning outcomes or rigorous academic standards (CFR 2.1., 2.3, 2.4, 3.10). Sofia's core faculty are deeply committed to the institution, but many of those who spoke about the push into international markets felt they were excluded from discussions about the international programs and the rigor of their learning outcomes and that decisions regarding those programs and outcomes were being driven entirely by financial motives. The Director of the Global College assured the team that no degree programs were being offered, or contemplated, within that office, only non-accredited certificates. While the visit team lauds the creative relationships being developed with China, it urges Sofia to carefully develop and monitor such programs with robust academic oversight to ensure quality outcomes and adherence to the Sofia University mission.

On January 15, 2020, the Provost and Chief Academic Officer presented the beginnings of an Academic Master Plan to the Sofia University Board of Trustees. This plan was intended as a supplement to the larger Sophia University Strategic Plan: 2019–2023. Although the Academic Plan was at an early stage of development at the time, it proposed a road map for developing and growing academic programs at Sofia. In reviewing subsequent actions taken by Sofia regarding academic programs, the team found little evidence that the plan had been further developed or was instrumental in decision-making regarding academic offerings (CFR 3.7, 4.6). It is hoped that considerably further thought and development will be

afforded the Academic Master Plan so that it provides a strong framework for Sofia's programs and program development as a component of the university's strategic plan and mission.

The team recognizes that Sofia University is undergoing a number of transitional changes while also dealing with financial difficulties related to enrollment. It also recognizes that under such conditions, expediency can lead to the shelving of important plans. However, the university's leadership is strongly encouraged to work closely with faculty to complete the development of the Academic Master Plan and to use it in the process of any major academic offering decisions (CFRs 3.7, 3.10, 4.6).

While it is important to use financial and marketing data to make decisions regarding academic offerings, Sofia must also ensure that decisions regarding curriculum and program development involve robust faculty and academic oversight, including the creation of learning outcomes that are appropriate to the respective discipline, the degree level, and to the university's mission (CFRs 2.1, 2.2, 2.3, 2.4, 3.10, 4.5).

Issue 8: Status of State Authorizations to Offer Programs in Other States (CFR 1.7).

The final area of the Special Visit focus is the status of state authorization to offer programs in other states (CFR 1.7). The university hired the law firm of Duane Morris, which has a higher education practice, to conduct a comprehensive review of Sofia's state authorization compliance. The firm examined the status of the programs (specific states where students were domiciled), states in which advertising is conducted and students recruited, and state-by-state compliance. As part of the review, Sofia stopped enrolling students from certain states and received authorization to enroll students from the states where the university continued to enroll students. The institution also updated their website to preclude students from certain states (where the institution did not have authorization) from enrolling at the university. Overall, Sofia was found to be in compliance with state authorization rules (CFR 1.7).

SECTION III – FINDINGS, COMMENDATIONS, AND RECOMMENDATIONS

The Special Visit team recognizes and affirms the hard work that went into preparing for this review and in responding to the team's requests for additional documents and adjustments to the schedule.

Commendations. The team commends Sofia University for the following four (4) accomplishments and practices:

1. The Board of Trustees is a qualified and engaged group who take seriously their fiduciary responsibilities and have adopted robust by-laws, policies and procedures to guide their work and have dedicated themselves to data-driven decision-making and continuous improvement, both for the university and for their own work as board members.
2. The president and his senior staff are able leaders with qualifications and insight to help guide Sofia through the next phase of transformation, create a mature and stable institution and work to improve continuously the capacity, sustainability, and quality of the university.
3. Sofia's faculty members are highly qualified, engaged, and enthusiastically involved in the life and development of the University, particularly noticeable in their enthusiasm for the new direction of the institution and in their embrace of the assessment of student learning and continuous improvement.
4. The institution has developed an innovative graduate degree program, in partnership with a preeminent Chinese university, with demonstrable and sustainable enrollment that can help Sofia reach the point where it may grow and thrive.

Recommendations. The team has identified the following four (4) recommendations to focus Sofia University's ongoing and future efforts:

1. Sofia should align its various strategic planning initiatives and assure integration with its academic master planning, marketing and enrollment projects, and budgetary processes, which will require review and refinement, as well as clear ownership of the plan as a whole and in its parts, fully articulated and measurable goals, and demonstrable metrics that inform organizational decision-making (CFR 3.7, 4.6).
2. Sofia should ensure that curriculum and program development involves robust faculty oversight, which includes creating learning outcomes that are appropriate to the discipline, to the degree level and to the university's mission and ILOs (CFRs 2.1, 2.2, 2.3; 2.4, 3.10, 4.5).
3. Sofia should continue to develop robust student learning assessment and program review processes that connect CLOs, PLOs, and ILOs in an observable and measurable way and that ensures faculty incorporates the appropriate learning outcomes into curriculum to use for assessment and improvement of student learning (CFRs 2.4, 2.7, 4.3, 4.4).
4. Sofia should develop an appropriate feedback mechanism that ensures assessment information is both received by and acted upon by appropriate academic leadership to foster continual improvement in educational outcomes (CFRs 4.1, 4.3, 4.4, 4.5).