



March 11, 2013

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PRESIDENT
Ralph A. Wolff

Lucille Sansing
President
Trident University International
5757 Plaza Drive, Suite 100
Cypress, CA 90630

Dear President Sansing:

At its meeting February 20-22, 2013, the Commission considered the report of the Special Visit team that conducted an on-site review of Trident University International November 5-6, 2012. The Commission also reviewed the Special Visit report submitted by the university prior to the visit and the institution's January 18, 2013 response to the visiting team report. The Commission appreciated the opportunity to discuss the visit with you, Michael Mahoney, Provost, Karen Viechnicki, Board Chair, and Nolan Miura, Board Vice-Chair. Your observations were very helpful in informing the Commission's deliberations.

Background. In June 2011, the Commission was originally scheduled to take action on Trident's Educational Effectiveness Review (EER). That discussion was tabled in light of information the Commission received that Trident awarded baccalaureate degrees to students who had not fulfilled the University's general education (GE) requirements. In addition, Trident failed to notify WASC of this problem when it was first brought to the institution's attention by the Servicemembers Opportunity College (SOCNAV), an organization that works with the United States Navy to assure that the colleges that Navy personnel attend are appropriately accredited and military-friendly. Because of the serious breach of Standards One and Two related to integrity and general education, the Commission issued an Order to Show Cause why Trident's accreditation should not be terminated effective March 30, 2012.

A Special Visit team visited Trident in November 2011 and concluded that the university had made significant progress in addressing the ten areas mandated by the Commission for improvement but that some work was still needed. The Commission subsequently acted on March 6, 2012, to remove Trident from Show Cause and to impose Probation for one year, finding that, notwithstanding the progress to date, Trident remained out of compliance with elements of Standards One and Two related to integrity and general education, warranting a continued sanction.

Scope and outcome of the 2012 Special Visit. The Commission scheduled a November 2012 Special Visit to review the institution's progress on addressing

the remaining areas of concern and to update the findings of the EER team report from April 2011. The Commission letter of March 6, 2012, identified fourteen areas for attention.

As noted below, the team reported significant progress in each of the specified areas. Below is an assessment of Trident's progress in each.

Completing audit of records and remediation for impacted students and alumni. The team reported that Trident had completed overhauling its registration, enrollment, and degree audit policies and procedures, including establishing a system of checks and balances; instituting "gating," whereby students must furnish any missing official records by the end of two enrollment sessions or be blocked from registration; and putting in place a rigorous program of staff training. Over 13,000 student record files were analyzed and the team determined that "moving forward, the likelihood of finding new student records with a general education issue is highly unlikely." Overall, 298 cases were identified in which a degree was conferred without the student completing the general education requirements. When offered the chance, 140 students completed remediation. Of the remaining 158 cases, 28 declined remediation and the others have not been reachable or were unresponsive. Trident will continue its efforts to contact those students. The team praised the institution for its considerable efforts to address issues that resulted in sanctions and to develop systems and procedures to prevent further occurrences of these issues. The Commission concluded that Trident's new procedures and organizational structures, as the team noted, "not only addressed the audit issues, but prepare the institution to successfully manage and utilize sound student record management practices." (CFRs 1.8, 2.2)

Implementing new technological systems. Trident's legacy Student Information System (SIS) was not able to identify GE deficiencies in students' transcripts. As a result, Trident is upgrading its current systems. The university has signed a master agreement for a new learning management system (LMS). The Commission is pleased to learn that staff training is underway as well as preliminary steps for implementing the new system. A formal request for proposals for a new student information system has been issued, a short list identified, and the successful vendor will be announced in spring 2013. The Commission expects Trident to put in place proper feedback loops from all stakeholders since this is critical to successful implementation of these important systems. (CFRs 1.8, 3.7)

Strengthening student complaint protocols. The EER team in April 2011 expressed concern that Trident's then-current procedures classified as "complaints" many kinds of student communications, including those that might more properly be categorized as questions, requests for advice, grading issues specific to a single course, and so on. A Trident working group revamped practices and protocols. The team concluded and the Commission concurs that complaints are now effectively managed, with no identifiable continuing issues. (CFRs 1.7, 1.8, 3.1)

Enhancing the academic culture. Trident made significant changes in its leadership as a result of its WASC sanction. After a period of interim appointments, at the time of the November 2012 visit, Trident had installed permanent new leadership (CEO, CAO, CFO) that the team viewed as "talented and educationally oriented." Overall the team was "encouraged" by the President's open faculty forums, meetings between faculty members and the Board, and by "a keen interest

of all parties in breaking down silos and establishing a culture of openness.” However, the team observed two cultural dynamics: those who referred to Trident as the “company” (primarily those on the business side) and those who referred to Trident as the “university.” Work is needed to ensure that the academic nature of the university remains the primary focus of the institution. (CFRs 1.3, 1.9, 3.1, 3.10)

Refining and implementing assessment, program review and institutional research. At the time of the April 2011 EER visit, Trident was, according to the team’s ratings on the Educational Effectiveness Framework, in the “emerging” stages of implementing comprehensive assessment and periodic program review. Results of assessment were not being used to improve student learning at the institutional level; only three of 15 educational programs had completed the program review process; and the institutional research capability was incipient.

At the time of the November 2012 Special Visit, Trident was described by the team as a “developed” institution approaching “highly developed” on the Educational Effectiveness Framework. The team was impressed with Trident’s “well-established commitment to educational effectiveness” and especially praised the widespread deployment of student learning outcomes and expectations for student learning; a completed Institutional Assessment Plan aligned with university mission, vision, value propositions and strategic plan; a “well-developed,” “mature,” and “excellent” program review process (11 of 15 programs have been reviewed, including evaluations by external reviewers); the use of assessment results to support improvement; the creation of an assessment infrastructure with an administrative position and institution-wide committee; and the high level of commitment and engagement of faculty in the assessment of student learning.

Overall, the team found that Trident faculty have “embraced a culture of evidence and embedded assessments at all levels: course, program and institution.” The Commission commends Trident for these accomplishments and for its clear commitment to continuous improvement. Regarding institutional research, the Commission expects increased attention to strengthening the office’s expertise, meeting the office’s ambitious set of goals, and assuring that Trident gathers, analyzes and interprets data that can be used to improve educational effectiveness. The Commission acknowledges the steps Trident has taken since the Special Visit to strengthen the office’s functioning. (CFRs 2.4, 2.6, 2.7, 2.10, 4.4, 4.5, 4.7)

Understanding and supporting student success. Trident has made progress in analyzing aggregated and disaggregated retention and graduation data and benchmarking the findings against online comparison institutions. Trident recognizes that efforts are needed to improve its retention and graduation rates. To that end, the institution has initiated a campus-wide retention committee, hired outside consulting expertise, and developed a 10 point plan for retention to guide improvements in this area. The Commission commends Trident for putting in place new policies that will help student retention and graduation rates. The Commission expects Trident to continue to develop metrics, gather and analyze data to determine the effectiveness of the initiatives in the ten-point plan, and use that information for ongoing improvement. In previous visits, teams have commented on the minimal support services available to students. Trident, in response, created a Student Services Working Group that identified a priority list of student services and plans for their implementation. The Commission is pleased to learn that new

services are underway. The Commission expects Trident to continue to implement these plans in a timely fashion, to develop strategies to assess the effectiveness of student services, and to use that information for ongoing improvement. (CFRs 1.2, 1.5, 1.7, 2.5, 2.10, 2.13)

Improving faculty-related policies and faculty participation. At the time of the April 2011 EER, the team found that communication and faculty input into decision making consisted of a “patchwork of formal and informal” methods. Since then, Trident has taken steps to increase the faculty role in governance and academic oversight. The team was encouraged by the determination of faculty to become more engaged in decision-making and the willingness of the administration to see that this happens. The team concluded and the Commission concurs that the university “is moving in the right direction, but more work needs to be done in developing governance structures that will give faculty a stronger voice.” The team expressed concerns about the lack of multiyear contracts for faculty, even though this had been a recommendation from past WASC teams, and about the process for developing the first draft of the faculty handbook, which was written without faculty input. The Commission commends Trident for making progress since the visit on multiyear contracts and for creating a faculty task force that drafted major sections of the handbook related to academic governance, faculty evaluation, and other academic topics. Trident expects the handbook to be completed in March 2013. (CFRs 1.3, 3.2, 3.4, 3.11)

Strengthening board governance. The board revised its bylaws, revamped its membership and strengthened its operations to become independent. It now has a handbook, orientation policies and procedures, and detailed committee charges; it is currently conducting a 360-degree review of the President. The Commission commends the board for the steps it has taken and its commitment to the integrity of the university. The Commission expects the board to ensure that the academic nature of the university is the dominant culture. (CFR 3.9, Policy on Independent Governing Boards).

The Commission endorsed the findings, commendations and recommendations of the Special Visit team and in particular commends Trident and its stakeholders for the seriousness with which they have addressed the Commission’s concerns and for the significant changes to its institutional culture.

The Commission wishes to emphasize the following areas for further attention and development:

Faculty related policies, practices and participation. The team observed a much-improved atmosphere at Trident and faculty’s “increased commitment to the university with the establishment of an increased role in governance and academic oversight.” The Commission expects the university to continue its efforts to enhance faculty governance. (CFRs 3.2, 3.3, 3.11)

Student success. The Commission commends Trident and the Board of Trustees for identifying retention and graduation as key issues for the university and for recognizing the importance of strengthening student services. The Commission expects Trident to proceed with plans and efforts to improve overall retention and graduation rates and to improve and assess student services for Trident’s unique student population. (CFRs 2.10, 2.13)

Systems development and implementation. As the team noted, “Maintaining a high level of energy, focus and collaboration” will be needed to put in place the new LMS and SIS systems. Continuing the effective planning and management of resources will help ensure successful implementation. (CFR 3.7)

Institutional research (IR). Trident has begun to make progress toward establishing a robust IR office. IR capability will be “an important resource” for Trident as it moves forward to address issues such as retention and graduation rates, assessment and educational effectiveness, student and faculty satisfaction, and related metrics. Trident is expected to invest in appropriate training and development for IR staff so that the office employs best practices in institutional research. (CFR 3.1)

Strategic financial plan. Given the uncertainties regarding sequestration, the shifting levels of support for the education of active military service members and veterans, and other financial challenges posed by possible changes in government policies and regulations, Trident will want to develop a strategic financial plan to be able to meet its long-term goals and objectives. (CFRs 4.1, 4.2)

Credit hours. At the time of the November 2012 visit Trident had developed forms, checklists, rubrics and procedures to verify credit hours, but had not begun the review process. Since then, Trident has analyzed a broad sample of courses and made adjustments in workload as needed. The Commission expects Trident to complete the credit hour review as quickly as possible to assure that units assigned are appropriate for the expected and actual student workload. Once the review is completed, Trident should notify WASC staff. (WASC Policy on Credit Hour)

The Commission acted to:

1. Receive the Special Visit Report.
2. Remove Probation.
3. Reaffirm the accreditation of Trident University International.
4. Schedule the next comprehensive review with the offsite review in Fall 2018 and the visit tentatively scheduled for Fall 2019.
5. Request an Interim Report on March 1, 2015, on the progress of the following:
 - a. Implementing faculty multiyear contracts
 - b. Improving retention and graduation rates
 - c. Putting in place enhanced student services and assessing their effectiveness
 - d. Implementing the new Learning Management System and the new Student Information System
 - e. Developing a robust institutional research function
 - f. Creating a strategic financial plan
 - g. Describing ongoing mechanisms to assure alignment of unit credit and workload

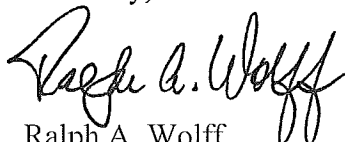
In taking this action to reaffirm accreditation, the Commission confirms that Trident University International has satisfactorily addressed the two Core Commitments to Institutional Capacity and Educational Effectiveness, and has successfully completed the three-stage review conducted under the Standards of Accreditation.

As Trident addresses the issues cited above, it should be mindful of the expectations that it will need to meet at the time of its next comprehensive review, which will take place under the revised Standards of Accreditation and institutional review process in the *2013 Handbook of Accreditation*. These expectations build on past practice and will include, for example, student success, quality improvement processes such as assessment and program review, planning, and financial sustainability. However, the *2013 Handbook* also includes new foci: the meaning, quality, and integrity of degrees; student performance in core competencies at the time of graduation; and institutional planning for the “new ecology” of learning. The institution is urged to familiarize itself with the *2013 Handbook* and to approach its challenges in ways that will address both old and new expectations.

In accordance with Commission policy, a copy of this letter will be sent to the chair of Trident’s governing board in one week. The Commission expects that the team report and this action letter will be posted in a readily accessible location on the Trident’s web site and widely disseminated throughout the institution to promote further engagement and improvement. The team report and the action letter will also be posted on the WASC website. If the institution wishes to respond to the Commission action on its own website, WASC will post a link to that response.

Finally, the Commission wishes to express its appreciation for the extensive work that Trident undertook in preparing for and supporting this accreditation review. WASC is committed to an accreditation process that adds value to institutions while assuring public accountability, and we are grateful for your continued support of our process. Please feel free to contact me if you have any questions about this letter or the action of the Commission.

Sincerely,



Ralph A. Wolff
President

RW/bgd

cc: Harold Hewitt, Commission Chair
Mike Mahoney, ALO
Karen Viechnicki, Board Chair
Members of the Special Visit team
Barbara Gross Davis, Vice President