

REPORT OF THE WSCUC TEAM

SPECIAL VISIT

to

Humphreys University

April 23 - 26, 2024

Submitted by

Judie Wexler, Chair
President Emerita California Institute of Integral Studies
San Francisco, CA

Shirley McGuire, Assistant Chair
Professor and Former Senior Vice Provost for Academic Affairs
University of San Francisco
San Francisco, CA

Nicole J. Jones
Public Commissioner
WSCUC
Los Angeles, CA

Peter Michell
Member, Board of Trustees
Kaiser Permanente School of Allied Health Sciences
Richmond, CA
Vice President for Finance and CFO - Retired
Saint Mary's College of California
Moraga, CA

Tamela Hawley
Vice President, WCUSC
WCUSC Visit Liaison

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

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. Once an institution achieves either candidacy or initial accreditation, the team report and Commission Action Letter associated with the review that resulted in the granting of either candidacy or initial accreditation and the team reports and Commission Action Letters of any subsequent reviews will be made available to the public by publication on the WSCUC website.

TABLE OF CONTENT

| | Page numbers |
|---|--------------|
| SECTION I. OVERVIEW AND CONTEXT | 1 |
| A. Description of the Institution and Visit | 1 |
| B. Description of Team’s Review Process | 4 |
| C. Institution’s Special Visit Report: Quality and Rigor of the Report and Supporting Evidence | 6 |
| SECTION II. TEAMS’S EVALUATION OF ISSUES UNDER THE STANDARDS | 7 |
| A. Issue 1: Fiscal Viability | 7 |
| B. Issue 2: Academic Integrity and Communication with WSCUC | 10 |
| C. Issue 3: Governance | 13 |
| D. Issue 4: Strategic Planning | 17 |
| SECTION III – OTHER TOPICS: | 19 |
| SECTION IV. FINDINGS, COMMENDATIONS AND RECOMMENDATIONS | 19 |
| APPENDICES | 21 |

SECTION I. OVERVIEW AND CONTEXT

A. Description of the Institution and Visit

Humphreys University was founded as Humphreys College in 1896 when John R. Humphreys, Sr. merged the existing Stockton Business College, Normal School, and Telegraphic Institute, making it the first institution of higher education in the city of Stockton. John R. Humphreys, Jr. became president of the institution in 1937, and, in 1947, the institution was renamed Humphreys College. Robert G. Humphreys, Sr. became president in 1980, and Robert G. Humphreys, Jr. assumed the presidency in 2014, marking a continuous leadership of four generations of Humphrey family members. In the fall of 2017, the Board of Trustees authorized the renaming of the college to Humphreys University, reflecting its broader range of educational offerings. At its main campus in Stockton, Humphreys offers associate, baccalaureate, and graduate degrees in the areas of business, law, liberal studies, and education. At its off-campus site 25 miles south in Modesto, the University has offered both undergraduate and graduate programs. The campus has provided degree programs since 1987.

The University has offered a degree completion BS in Business Administration to international students via an MOU with Maxwell College at an education facility, referred to as the Arcadia campus, which is actually located in the City of Industry in Southern California. The previous review team determined that this off-campus location had not been approved by WASC Senior College and University Commission (WSCUC). The location and program are closed, as discussed below.

Most programs at Humphreys University are approved by WSCUC to be offered on-site and/or at a distance. Since 2021, these programs have been offered in a blended format, such that students may choose to attend in person with a professor present at a campus or to participate interactively and/or asynchronously via Zoom. Most students continue to choose to attend classes at a distance via Zoom. Exceptions to the blended modality are the Court Reporting and Master of Arts in Education programs, which are offered only at a distance, and the MBA with a concentration in Information Technology, which is offered mostly at a distance but with a required face-to-face weekend each term at the Stockton campus to meet visa regulations for international students. The Committee of Bar Examiners (CBE) of the State Bar of California first accredited the Drivon School of Law, in 1983. Since 1992, the University has been accredited by both the CBE and WSCUC.

Humphreys University has worked to strengthen two pipelines into their institution. First, the University is geographically close to two elementary schools, a trades school, and the ABLE Charter Schools. ABLE consists of an elementary and secondary school with a strong college-preparatory curriculum. Humphreys and ABLE have created a program where qualified ABLE high school students may take Humphreys classes for free for college credit, and may also use ABLE high school classes as credit toward an Associate of Arts degree in Liberal Arts. The team has concerns about this agreement, which are outlined below. Second, Humphreys has a contract with Howell Management Services, LLC (HMS) to recruit international students into their MBA programs and the programmatic relationship complies with WSCUC policies. The partnership has led to an increase in graduate students in MBA programs. In exchange for recruiting international students, the university pays HMS approximately 40% of tuition received from the recruited students. HMS has no role in the development, management, teaching, or

assessment of the courses or program and has no role in the selection or hiring of faculty. HMS has provided input and student data to Humphreys' faculty, admissions staff, and registrar office that has led to improvements in the international student experience both online and on campus.

Humphreys University enrolled 660 unduplicated students during the 2022-2023 academic year. At the time of the team's Special Visit (SV), in Winter 2024, enrollment for the academic year had risen 39.8% to 923 unduplicated students, with 233 students (25%) in undergraduate programs and 690 (75%) in graduate programs.

The University offers undergraduate degree programs (B.A. and A.A.) in eight majors, four Masters of Arts (M.A.) programs, and a J.D. degree program through its law school. These are designed to lead to career opportunities. The ethnic diversity of the student body reflects the diversity of the San Joaquin Valley and surrounding area (61% of the undergraduate students and 58% of the graduate students are of color, an increase from 55% since the last visit in February 2023).

Finally, Humphrey University administrators, faculty, and staff reference the University's mission that is on their website repeatedly. This mission statement defines Humphreys as an institution and clearly frames its educational goals as preparing students for meaningful careers and meeting the needs of a diverse student body (CFRs 1.1 and 1.4):

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

The self study indicates that the mission statement is in the process of being updated and a future team may want to review it again.

B. Description of Team's Review Process

The team prepared for the Special Visit (SV) by reviewing initial materials submitted by the institution, including the institutional SV report and attachments, the February 2023 visiting team report, and the resulting Commission Action Letter.

The team communicated via email and determined that additional materials were needed before the team virtual meeting on April 17, 2024. A request for the following documents was sent on March 18, 2024 to the ALO:

- Final audited financial statements for the fiscal year ended June 30, 2021
- Final audited financial statements for the fiscal year ended June 30, 2022
- Final audited financial statements for the fiscal year ended June 30, 2023
- Most recent YTD budget versus actuals report for the current fiscal year (FY24)
- Bar exam pass rate report for last three (3) to five (5) years
- Trend enrollment data for the last five (5) years by program

- MOU with ABLE High School for Associate of Arts (AA) Liberal Arts Pathway
- Enrollment and graduation rate data for ABLE students in the dual-degree Associate of Arts in Liberal Studies program
- Position descriptions for President, Provost, and positions updated since last Special Visit in February, 2023
- Current list of Board of Trustee members with short bios
- List or chart of committee assignments for Board of Trustees members
- Organizational chart for university committees
- Marketing materials sent to prospective international students for the program with Howell Management Services (HMS)
- Marketing materials sent to prospective high school students for ABLE program
- Marketing materials sent to prospective students an online or hybrid program
- Proposal for the Humphreys Everywhere initiative
- Documents communicating enrollment targets to administration, faculty, and staff
- Approved teach out plan for students in the Arcadia/Maxwell College program

The Accreditation Liaison Officer (ALO) uploaded the materials on April 9, 2024 and sent a draft schedule and logistics sheet to the team on April 14, 2024. The team held its conference call on April 17, 2024 to discuss these materials; after the team call, information about in-state and out-of-state students by program was requested from ALO via email. The team assistant chair and ALO met on virtual on April 19, 2024. They discussed changes to the draft schedule and the enrollment data was shared and uploaded to the team folder. The final SV visit schedule was confirmed on April 21, 2024.

The team held its first in-person executive meeting of the SV on Tuesday, April 23, 2024 at 4pm in the hotel conference room. During the meeting, the team reviewed the special visit schedule, including identifying and clarifying attendees for each meeting. Also, the team discussed and prioritized lines of inquiry for the development of key questions in relation to the issues highlighted for the special visit in accordance with the WSCUC Commission Action Letter. The team continued to meet in executive sessions throughout the SV. Members updated each other on information learned and questions that emerged during interviews and after reviewing additional materials. The entire team worked to triangulate sources of information about the important issues they were tasked to review. The majority of issues were addressed through a combination of a review of information submitted by Humphreys, questions answered by both administrators and faculty or staff. Students were not interviewed to allow for more time to talk with administrators, faculty, and staff, given the issues. In addition, previous teams had met with student groups.

During the SV, the team met with the full Board of Trustees, CEO and President Robert Humphreys, Jr., Provost Jess Bonds, CFO Miles Denniston, Dean of Undergraduate Studies

Cynthia Becerra, Dean of the Law School and ALO Matthew Reynolds, Dean of Institutional Research Lisa Kooren, Associate Dean of Academic Administration Donna Roberts, Director of Administrative Services Carrie Castillon, Registrar and DSO Wendy Campigli, Principal Kerri Scroope of ABLE High School, Howell Management Services Managing Director Justin Howell and Owner Chris Howell, the Executive Committee, the faculty representatives of the Academic Senate, the Strategic Planning, Committee, the Viability and Feasibility Committee, the Provost Search Committee, the independent auditor, and members of the Admissions team.

After the first day of interviews, the team requested the following additional information:

- a list of attendees for each meeting with full names and titles.
- unduplicated enrollment numbers for undergraduate and graduate students separately for domestic and international students over the last 5 years.
- a paper copy of the General Catalog.
- syllabi review and other analyses for determining that high school ABLE courses Algebra I and II can be substituted for the Humphreys University course Math 100.
- A list of the number of faculty (Full-Time, Adjunct) by program since 2020.

The ALO provided the information promptly for all requests except for one. Humphreys did not conduct an analysis of syllabi for the high school courses included in the AA of Liberal Arts degree. Instead, the course descriptions of the high school courses were reviewed to see if the course contents were equivalent to college-level courses, and, consequently, could be substitutes for Humphreys courses in the ABLE pathway, as listed in the MOU between ABLE and Humphreys.

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

Humphreys University reconvened their WSCUC Task Force created by the president to examine the recommendations in the Commission Action Letter and the previous team report. The task force was again chaired by the Chair of the Academic Senate and was composed of faculty members, both full-time and adjunct, to examine the issues, identify what had been done to that point to address them, and recommend additional steps the university could take to meet the Commission and visiting team's expectations. The ALO was added as a member of the WSCUC Task Force. After several months of continued action to address WSCUC's concerns and equipped with initial drafts of the WSCUC's Task Force's own report, Humphreys University's Executive Committee began drafting their SV report. The second draft report was distributed to the Academic Senate and the Board of Trustees for comments and suggestions. The final submitted report described the many actions Humphreys University has taken over the preceding months to address the specific points under the five issues highlighted by the Commission.

The SV team found the SV Report from Humphreys University more substantive and data-driven compared to previous reports. More attention was paid to analysis of the key issues. Humphrey

made considerable progress in the financial sustainability, compliance and regulatory review, academic process, and governance areas. The team was particularly impressed with the strategic plan and community-driven SWOT analysis.

After reviewing the report and information in the appendices, the team still had questions about concrete next steps in the strategic plan and the funding of those steps. The report did not include important documents, such as the auditor reports (CFR 3.4). In fact, the team was given only 1-year of financial data and the report combined operating and non-operating funds. In addition, the enrollment reports were confusing. The reports often used duplicated headcounts and did not disaggregate the data (CFR 4.2). The enrollment numbers often differed from each other for the same time period. The team had to ask for additional reports throughout the visit and had to ask specifically for unduplicated headcounts. Finally, the section on academic integrity was particularly weak. Even with the work on compliance and decision-making processes, the team was concerned that the governance changes might not be clear and stable enough to strengthen shared governance so that the integrity of the Humphreys University degree would be ensured (CFR 2.2).

SECTION II. TEAMS'S EVALUATION OF ISSUES UNDER THE STANDARDS

A. Issue 1: Fiscal Viability

The special visit team report and WSCUC Commission findings from last year expressed concerns about a history of operational deficits and the projection of additional deficits due to low enrollment and inadequate revenue diversification strategies. They also found that the university must expedite plans to increase revenue and address ongoing deficits; develop strategies to grow enrollment that are realistic, and data informed; assess the viability of proposed new programs; and align budgetary processes with strategic priorities (CFR 3.4).

A review of audited financial statements for FY 2022-2023 (most recent available) shows a small operating deficit of \$17,689 when one-time Paycheck Protection Program (PPP) loan forgiveness funds of \$899,213 are removed from total revenues. Unrestricted net assets did, however, increase by \$881,524 to \$16,075,477 at the end of FY 2022-2023 due to the PPP loan forgiveness funds. This marks the third fiscal year in a row that unrestricted net assets increased (inclusive of funds from PPP loan forgiveness) following five years of decreases going back to FY 2015-2016, when that fiscal year began with a balance of \$18,471,530 in unrestricted net assets.

The recent increases in unrestricted net assets, although not yet back to the level of \$18,471,530 at the start of FY 2015-2016, did help elevate the university's composite financial responsibility score to 3.6 at the end of FY 2022-2023. This score had been as low as 2.2 at the end of FY 2019-2020. The team notes that an institution's composite financial responsibility score must remain above a threshold of 1.5 to be deemed financially responsible by the U.S. Department of Education. The team also notes that the university's composite financial responsibility score was

also helped by a growth in net student tuition and fees from \$4,517,530 during FY 2021-2022 to \$5,387,316 during FY 2022-2023, an increase of \$869,786 or 19.3%. Finally, the team notes that the net student tuition and fees total of \$4,517,530 recorded during FY 2021-2022 marked the low point in net student tuition and fees levels that had been declining from the \$9,005,434 amount recorded during FY 2015-2016.

A review of the most recent and past audited financial statements also shows that facilities lease revenue and revenues from other miscellaneous sources, the university's non-student revenue diversification sources, have also grown in amount and proportion, especially in more recent years. These revenue sources totaled \$525,625 or 5.4% of total operating revenues during FY 2015-2016 and grew to \$1,957,823 or 25.3% of total operating revenues (exclusive of funds from PPP loan forgiveness) during FY 2022-2023.

The team notes that the statement of activities (a.k.a. income statement) in the audited financial statements of Humphreys University is a "one part" statement that does not separate operating revenues and expenses from non-operating revenues and expenses as a more commonly used "two part" statement of activities would do. This means that investment income used to support operations, if any, cannot be determined from reviewing the statement of activities as the investment income line records realized and unrealized gains and losses over the course of the fiscal year (this is a non-operating item) rather than the amount of investment income or "spending" (a combination of realized income and gains) from investments that was used to support operations (this is an operating item) during the fiscal year. The team is thus unable to verify the diversification factor that investment income provides to the university.

The team also notes that revenues from philanthropic sources remain minimal and do not provide any verifiable support for university operations, although donor gifts have been received for select capital projects. The lack of consistent donor support is further demonstrated by the fact that the university does not have any restricted net assets that would typically be associated with a donor funded endowment.

Finally, the team notes that the statements of financial position (a.k.a. balance sheet) in the audited financial statements of Humphreys University do show that more assets are currently being recorded as investments in marketable securities rather than as cash and cash equivalents, which should enable these assets to grow and provide more support of operating activities. Cash and equivalents totaled \$8,673,137 at the end of FY 2015-2016 while investments in marketable securities totaled \$1,675,054. By contrast, cash and cash equivalents totaled \$3,918,482 at the end of FY 2022-2023 while investments in marketable securities totaled \$7,500,122.

Humphreys University's special visit report dated February 23, 2024 attributed its improved financial operating results to the advancement of its 2019-2024 revised strategic plan that focused on enrollment growth and diversification of enrollment including the refinement of enrollment projections using three primary data points, the alignment of budgetary processes

with strategic priorities, and the completion of its 2024-2029 strategic plan. The report shows that total enrollment has increased each term (the university has four terms per year) during FY 2022-2023 with terms during current FY 2023-2024 also exceeding budgetary projections. The most recent university enrollment report published during the team's visit shows a 12-month IPEDS headcount enrollment of 923 enrolled students (584 domestic and 339 international) spread between its undergraduate (233 students) and graduate (690 students) programs for FY 2023-2024. This represents an increase of 263 or 39.8% from the 660 enrolled students during FY 2022-2023.

The 2024-2029 strategic plan and its related appendices also projects net income (surpluses) from its operating budgets for each year from current FY 2023-2024 through FY 2028-2029 that range from 2.1% to 9.5% of total operating revenues. These net income projections should continue to rebuild and grow the university's unrestricted net assets. These net income projections, the team notes, are linked to strategies and tactics included in the university's strategic plan 2024-2029, which will be addressed in a latter section of this report. The team also notes that the underlying enrollment projections through FY 2028-2029 appear achievable and data informed with recent enrollment trends outperforming budgetary targets.

Interviews with members of the board of trustees, key administrators, and the independent auditor attributed the university's improved and improving financial position to growth in student enrollment in several programs led by growth in international students enrolled in the MBA-IT program (a STEM MBA degree program that is being recognized as a STEM program by the U.S. Department of Homeland Security) and by growth in teacher credentialing programs. The interviews also indicated that these primary growth areas represented planned strategies to offer programs in multiple modalities and to diversify the sources of student revenues. The interviews detailed additional efforts to diversify the university's non-student revenue sources (investment, facility rental, and fundraising strategies) as well as a new structure (a viability and feasibility committee) to assess the viability of university programs. Still, the team was concerned when it learned during the meeting with the board of trustees and a discussion with the auditor that the audit committee has not met with the independent auditor yet, although the committee has met with each other via email.

In summary, the team finds that Humphreys University has demonstrated significant progress in addressing issues of fiscal viability through the implementation of strategies to grow and diversify student revenues, grow and diversify non-student revenue sources, and through the creation of processes for the development of a strategic plan linked to budgetary decision making and projections. The team also finds that these efforts were aided by the implementation of new and more inclusive shared governance structures (CFR 2.2) as well as a strategic partnership with Howell Management Services for recruitment of graduate students. The program with ABLE Charter Schools is also a potential pipeline. The team notes that the ABLE pipeline may not lead to increased revenue for Humphreys for three reasons: 1) high school students pay no

tuition to Humphreys for taking college classes if they are enrolled in ABLE; 2) ABLE students pay reduced tuition if they matriculate at Humphreys; and 3) few high school students in the ABLE program seem to enroll in Humphreys after graduating from high school.

The team did, however, have several areas of concern that the university should review to help improve oversight of its fiscal viability (CFRs 1.7 and 3.4). These areas include receiving more timely (audited financial statements for Humphreys University are being issued nine months after the end of the fiscal year) and better formatted audited financial statements, scheduling direct engagement between the independent auditor and the board's audit committee, advancing efforts to formally establish a quasi-endowment fund, and providing institutional support of efforts being undertaken by the institutional advancement committee of the board of trustees to engage the university's alumni and external communities for philanthropic and outreach purposes.

Based on the information provided by the university through documentation and interviews, as well as considering the concerns listed above, the team finds that Humphreys University is in compliance with the key components of CFR 3.4. In addition, the team has provided several recommendations to assist the university in improving compliance with this CFR which are provided later in this report.

B. Issue 2: Academic Integrity and Communication with WSCUC

The special visit team report and WSCUC Commission findings from last year urged Humphreys University to re-examine all programs and programmatic relationships to ensure that they are in compliance with WSCUC Standards and consistent with institutional plans and needs (CFRs 1.7, 1.8, and 2.1). The previous special visit team was particularly concerned about academic integrity and conflict of interest issues with the partnership with ABLE Charter school (CFRs 1.7, 1.8, 2.2, 2.2a, and 3.4) and programmatic, fiscal, and compliance issues with Maxwell College/Arcadia location (CFRs 1.7 and 3.4).

Humphreys University acted quickly to review their programs and correct regulatory and compliance issues associated with the program at Maxwell College/Arcadia (CFR 1.8). Humphreys' SV report notes that shortly after the last special visit, Humphreys decided to close the Maxwell location and its program due to decreased enrollments since the COVID-19 pandemic (CFR 3.4). In addition, the partner did not want to be a WSCUC-approved location. Humphreys is no longer accepting students into the BS Business Administration program at the Maxwell College location and is teaching out all current students at this location. These decisions were confirmed during meetings with administrators and the viability and feasibility committee. In addition, the provost, and then ALO, conducted an in depth review of all programs to ensure they were in compliance with WSCUC regulations, as documented in a submitted table and confirmed during meetings with the current ALO and members of the

academic senate and the viability and feasibility committees (CFR 1.8). Finally, a conflict of interest policy was adopted by the Board of Trustees on December 4, 2023, which includes a process for potential conflicts of interest involving the CFO given that he is contracted by both Humphreys and the ABLE Charter Schools (CFR 1.7).

The team has concerns, however, about the pathway with ABLE Charters schools. An MOU was signed by the superintendent of ABLE Charter Schools and President Humphreys on August 7, 2023 that outlines the pathway for ABLE high school students to earn an Associate of Arts (AA) in Liberal Studies by taking Humphreys courses starting in their sophomore year. The courses are free and the completion of AA degree allows the students to begin baccalaureate degrees at the junior level at Humphreys after they graduate from high school. In addition, high school students may enter the ABLE program to complete only a few Humphreys courses, if that is all their schedules will allow. Given the close physical proximity of the two schools, the pathway is an excellent opportunity for both institutions to serve underprivileged youth in the Stockton area and a possible pipeline for Humphreys bachelor and graduate programs.

The team became concerned about the ABLE pathway after they reviewed the MOU carefully and completed interviews with the registrar, two deans, and the director of the program at the high school. The high school courses were approved to be part of the AA degree after only a review of the course descriptions by a dean, leading the team to question the academic integrity of this degree (CFR 1.7). For instance, it is not clear that the high school courses are equivalent in content and quality to college courses, or if other universities would accept the AA degree with so many high school courses in the curriculum. It also appears that not everyone at Humphreys University understands that regular high school courses as specified in the MOU will count toward the AA in Liberal Arts degree (CFR 1.2). The team did learn during interviews with two of the deans that ABLE high school students will have to pass placement tests before they start the pathway program; however, this requirement is not stated in the MOU and it is not clear that the prospective ABLE students would understand that this is a requirement (CFR 1.6). In addition, the MOU for the ABLE pathway implies that any Humphreys course may be taken by ABLE students and count for the AA of Liberal Arts degree, which is not consistent with the Catalog description of the degree requirements and would differ from the degree pathway for the other Humphreys students in the AA of Liberal Arts program (CFRs 1.7, 2.2, 2.2a, and 2.3). Several administrators pointed to the Humphreys University mission statements about serving students from diverse economic backgrounds when discussing the program and a few people discussed the significant life and work experience of most Humphreys students. If these statements were meant to justify giving credit for typical high school courses, there are formal ways to provide students with credit for work and life experiences (e.g., competency-based credit) that would also meet the standards of academic integrity.

The team did uncover other decision-making processes regarding the student experience that

appear to have integrity. For instance, staff in admissions, the registrar, and the dean of institutional research independently outlined clear, efficient procedures for both state authorization of online programs and the I-20 process for international students. These student services members demonstrated up-to-date knowledge of compliance and regulatory issues. They discussed processes in place to ensure that decisions were made by multiple people with the best available information.

Humphreys University has made great progress restructuring and building their academic infrastructure (CFRs 1.7, 2.4, and 2.7). The university has almost centralized the Academic Senate as the body that monitors and maintains academic quality and integrity of current programs. The newly formed viability and feasibility committee conducts program reviews of current academic programs that are not meeting academic standards and/or seem financially unsustainable and may start working on academic innovation. This committee, however, may not be located in the best place in the Humphreys organization yet. It is currently a subcommittee of the executive committee and the committee members discussed moving under the new provost. The president, deans, and members of the executive committee, academic senate, and viability and feasibility committees all discussed how they align their decision-making with the mission and strategic plan in intentional, data-driven ways. The SV team reviewed and discussed with faculty and deans the revised court reporter program and the new pre-K education program, both of which are data-informed programs that went through, or are going through, clear academic approval processes. Still, the structures in place are new and were not used in the case of the ABLE pathway program. Thus, the team recommends that the university establish formal structures such that academic standards are reviewed and applied consistently to protect the quality of its academic program and ultimately create a successful student experience.

The team had one additional important concern regarding academic integrity. The administrators, faculty, and staff interviewed had a difficult time articulating the definition of academic quality at Humphreys University (CFR 1.2). Interviewees would talk about how unique Humphreys is as an institution and then provide examples of their high touch service or their practical career training. The team discussed the possibility that the Humphreys community has not had the space or time to talk about their definition of a high quality education more broadly because they have been addressing pressing financial and regulatory issues. The team recommends that Humphreys University define educational quality to be consistent with its mission and demonstrate academic integrity (CFR 1.2).

Based on the information provided by the university through documentation and interviews, as well as considering the concerns listed above, the team finds that Humphreys University is in compliance with the key components of CFRs 1.8, 2.4, 2.7 and 3.4. In addition, the team has provided several recommendations to assist the university in improving compliance with CFRs 1.2, 1.6, 1.7 2.2, 2.2a, and 2.3, which are provided later in this report.

C. Issue 3: Governance

The special visit team report and WSCUC Commission findings from last year expressed concerns about board of trustees governance and independence. The concerns centered on the lack of board term limits, the narrow conflict of interest policy not including an annual disclosure requirement, outsourcing CFO functions; board membership recruitment and appointment; and reinvigorating the inactive academic affairs and institutional advancement committees (CFRs 3.7, 3.8, and 3.9). In addition, the findings highlighted that there has been limited board development and training efforts despite the identification of this need in board assessment.

A review of the board of trustee meeting minutes, institutional reports, and interviews with board members show that there have been several actions taken to improve the operations of the board, including building an environment that supports and provides board development and training sessions. Working with the Association of Governing Boards (AGB), which was identified as a recommended resource in the last team report, Humphreys University convened a retreat for the board of trustees on October 28, 2023. During the board retreat, the AGB consultant delivered training related to the principles of good board governance and the current landscape of higher education, and helped lead the discussion about the board assessment survey results for future implementation

Following the WSCUC special visit, the board of trustees immediately began efforts to review and update the organizational bylaws. The bylaws of Humphreys University were amended on June 12, 2023, incorporating updates about membership terms and the board conflict of interest policies and procedures. The amended bylaws detail that a full term of membership is three years in length and that these would be staggered terms ensuring that one-third of the membership will rotate each year. While the length of terms has been codified, the terms are renewable for subsequent terms without a term limit. The team recognizes the board of trustees for its efforts to explore good board governance principles, however, the lack of term limits is outside of the AGB best practices to ensure a healthy balance of trustee experience and new perspectives.

Working on recommendations and next steps following the October 2023 retreat, a board handbook and onboarding process was adopted at the March 4, 2024 board meeting. Beyond working with members when terms begin, the board of trustees is also instituting a process for periodic board assessment that will help encourage board engagement and determine interest in continued service with Humphreys University. The board of trustees also attributed the board retreat and AGB resources as helpful in approaching the assessment of the president, which included an evaluation of performance and compensation. The interview with the board of trustees revealed that the training helped prepare them with a stronger understanding of their board oversight role and increased knowledge about higher education.

Following the retreat discussion and discussions during the last WSCUC visit, the board of trustees has restructured their meetings by using consent agendas to better utilize meeting times. Implementing the consent agenda format has resulted in receiving written reports in advance so that members come better prepared for discussion during meetings. Previously, all reports and materials were presented orally during the meetings. As such, the SV report and interviews during the visit revealed that this process has enabled the board of trustees to allocate time for

the most pressing issues, which has elevated their ability to serve an independent governing board. Moving forward the board of trustees discussed the need to more effectively use committees to perform board work in between the quarterly full board meetings.

A review of the board of trustees meeting minutes also shows that there has been a reinvigoration of the board committees. The revised bylaws outline the following four standing committees: finance and investment committee; trusteeship committee; audit committee; and institutional advancement committee. While these committees have been organized formally, interviews with the board of trustees and university administrators confirmed that the audit committee and the institutional advancement committee are less advanced in their work.

A significant change in the revised bylaws is the removal of the academic affairs committee. The board of trustees meeting minutes revealed that the decision to dissolve the academic affairs committee was made in order to make oversight of academic integrity functions a full board mandate. While this academic affairs committee issue is not identified as noncompliance, the special visit team remains concerned about whether there is sufficient infrastructure to support campuswide ability of Humphreys University to monitor academic rigor and consistent academic processes (CFR 3.9).

Other governance issues identified in the special visit team report and WSCUC Commission findings from last year related to implementation of the newly created organizational leadership and decision-making structures (CFR 3.7). The areas highlighted for improvements included monitoring the implementation of the shared governance matrix, tracking whether resources were adequately allocated and identified to implement and sustain the new configuration of leadership structures, and ensuring the incorporation of clear, formalized, and data-informed processes. In addition, improvements were recommended related to academic rigor and integrity based on findings highlighted in connection with the level of institutional capacity and educational effectiveness, specifically underscoring the importance of academic integrity (CFRs 1.2, and 3.7).

In considering the recommendation to address governance issues at Humphreys University, the team reviewed the leadership and decision-making structures, which have been enhanced since the last WSCUC team visit (CFR 3.7 and 3.10). The shared governance matrix, which was created during the last two years, has distributed authority more widely and appropriately across the university. In fact, throughout the team visit, faculty, staff and trustees referenced the shared governance matrix, which suggests that the Humphreys University community has nurtured campuswide buy-in and that there is intentional and functional reliance on these newly created structures instead of centering power on specified leadership positions.

Interviewees expressed that the foremost accomplishments addressing the governance issues has been that the changes have resulted in President Humphreys prioritizing university-wide visioning and leadership activities and empowering faculty, staff, and other university administrators to fulfill their roles (CFR 3.7 and 3.10). There was also collective resonance expressed that a heightened sense of engagement with the board of trustees has been a resulting benefit of the AGB training.

Humphreys University has refined and implemented several processes to maintain the newly created leadership and decision-making structures, including procedures for systematically assessing current and new programming with the expanded direction of the viability and feasibility committee (CFR 4.1). As articulated in the 2024-2029 Strategic Plan, the newly created viability and feasibility committee is charged with the continual data- and mission-driven review of programs, coordination of new program approval processes, and consideration of available program and school resources. The committee will most likely report to the new provost and work in conjunction with the academic senate, further strengthening shared governance.

One improvement repeatedly discussed during interviews with faculty and other university administrators was the increased participation of the outsourced CFO in various governance meetings, including presentations to the executive committee, academic senate and board of trustees (CFR 3.8). As discussed during team meetings, the involvement of the CFO ensures that the financial picture remains present in the shared governance structure, which adds an important nuance in the planning and decision making processes. A significant improvement referenced throughout the Humphreys University report and visit interviews is that the 2024-2029 strategic planning process is aligned with the budgeting cycle. During the visit, there was in-depth discussion and understanding among the Humphreys University community about the alignment with financial considerations, which displayed a conversant nature of financial components related to planning and decision-making (CFR 3.7).

The reconstituted academic senate, which is a merger of the academic council and graduate council, now serves as the major hub for ensuring consistent review and creation of academic policies across Humphreys University (CFR 3.10). While this body has become an important vehicle for information exchange and creating academic policies, such as the recently adopted AI policy, the academic senate does not specifically oversee the academic integrity of courses and programs, which is currently the responsibility of the department chairs, deans and will also be the responsibility of the viability and feasibility committee after they begin meeting. Interviews with committee members and administrators suggests that more work needed to clarify the various roles and responsibilities of the academic senate and its connection with the provost, chairs, and viability and feasibility committee for maintaining academic integrity (CFR 3.7).

The faculty governance structure should continue to be developed to support faculty in exercising effective academic leadership (CFR 3.10). A strategy to continue developing and supporting faculty is the continued provision of faculty in-service opportunities, which have enhanced connection and training for full-time faculty and adjunct instructors.

In summary, the team finds that Humphreys University has made substantial progress towards addressing the issues of governance through the engaged involvement of the Board of Trustees, the implementation of the shared governance matrix, and the incorporation of mission-driven and data-informed decision-making processes.

The team does, however, have a concern about the university's ability to conduct a timely search process for the next provost as the inaugural provost retires at the end of June 2024 (CFRs 3.6 and 3.8). Interviews with provost search committee members and leadership showed that efforts

have been underway to allow for extensive recruitment, including seeking input and candidate recommendations from the campus and alumni community as well as reaching out to higher education professionals across the nation. Yet, a clear, transparent process with a decision-making timetable has not been established and communicated out to the university community (CFR 3.7). During interviews, community members and members of the search committee identified a range of various attributes and preferences for the ideal provost candidates. The application deadline is May 31, 2024. Given the short timeline between application deadline and the current provost's retirement, there are concerns that there will be a delay in filling this position that could weaken the decision-making process during a fragile time in the university's organizational life cycle.

The special visit team also voiced concerns during team meetings that the university needs to continue to provide resources to implement and maintain the newly created leadership and decision-making structures, including efforts to strengthen the role and effectiveness of the board of trustees and reinforce the role of academic senate, executive committee, and other committees dedicated to defining and monitoring educational quality. The interviews conducted and materials reviewed describe an institution that is in the period of development and progression, and therefore Humphreys University will benefit from continuing investment of dedication, fidelity, and resources.

Additionally, the team has concerns related to the continued evolution of the academic senate as a voice for academic quality and educational visioning and the continued development of the board of trustees' role in overseeing academic affairs functions. More intentional work will be needed to define educational quality that is consistent with the Humphreys University mission and that demonstrates academic integrity. These processes should be fully articulated, documented, and evaluated using higher education best practices (CFRs 3.10 and 3.11).

Furthermore, the board of trustees should consider and utilize the results of the recent board assessment for their continued improvement. The team has concerns about the board committee structure; therefore, a recommendation is the creation of formalized descriptions of the board committees that include steps to evaluate the effectiveness of these entities. In consideration of the other areas identified in the board assessment, the board of trustees should continue exploring how term limits and targeted skills recruitment of future board members can enhance the evolving growth of the board and expand perspectives for Humphreys University (CFRs 3.7, 3.8, and 3.9).

Based on the information provided by the university through documentation and interviews, as well as considering the concerns listed above, the team finds that Humphreys University is in compliance with the key components of CFRs 3.7, 3.9, and 3.10. In addition, the team has provided several recommendations to assist the university in improving compliance with these CFRs which are provided later in this report

D. Issue 4: Strategic Planning

The special visit team report and WSCUC Commission findings from last year urged the university to accelerate the completion of its strategic plan update including revenue diversification strategies beyond enrollment and facilities related revenue sources. The university was also urged to incorporate into its strategic plan data informed and achievable strategies to create enrollment goals, assess the viability of proposed new programs, and to align budgetary processes with the strategic plan (CFR 3.4).

Humphreys University's special visit report dated February 23, 2024 detailed actions taken by the university to address the findings noted above. These actions included accelerating and completing a 2024-2029 strategic plan for review and approval by the board of trustees in March 2024 that was developed by a strategic planning committee (SPC) composed of members from all levels of the campus community. The strategic planning process appears to have been data informed and included a SWOT analysis with feedback from 28 members of the campus community. The strategic plan itself included revenue diversification tactics, data driven enrollment goals, structures and procedures for program viability assessment, and a budgetary process that aligns with strategic plan strategies and tactics.

The special visit report and its appendices, which included strategic plan 2024-2029, detailed the names and positions of the 12 members of the SPC, and noted that it selected its own members starting with a core group from the previous iteration of the SPC, elected its own leadership (two co-chairs), and did not include the president of the university in its membership. These documents also noted that the SPC would not disband after the strategic plan was approved, but would instead perform regular, periodic reviews and assessments of the implementation of the plan along with related recommendations for plan modifications as necessary.

The strategic planning process followed by the SPC, as described in the special visit report and its appendices, included a review of the university's mission statement, review of past processes used to develop earlier strategic plans, a margin analysis of most academic programs, and a SWOT analysis. Following these process steps, the SPC formed four subcommittees (admissions/recruiting, program effectiveness, tuition/funding, and retention/attrition) to create strategies and develop a draft plan. The SPC next formed two additional subcommittees (data subcommittee and expense, revenue, and implementation subcommittee) to organize data gathered from internal and external scans and to prepare projections of costs and fiscal outcomes. Finally, the SPC assigned responsible parties for each tactic within the plan's two major strategies: 1) reinforce and expand successful strategies (11 tactics) and 2) cultivate structures and revenue streams (two tactics).

The SPC submitted the strategic plan to the provost in October 2023 along with supporting data (the data behind the strategic plan document) and budgetary analysis (the 2024-2029 strategic

plan: expenses, revenue, and implementation document). The Provost, in turn, forwarded the plan to the president who then shared it with the board of trustees in December 2023. After review by the committees of the board of trustees, the full board approved the plan in March 2024 for implementation on July 1, 2024, the start of FY 2024-2025.

Team interviews with members of the SPC confirmed the processes used by the committee to develop a data and community input informed plan. The interviews also demonstrated the commitment of the members of the SPC to monitor the implementation of the strategic plan on a quarterly basis and to hold the university accountable for its implementation. Finally, the interviews indicated that the inclusive strategic planning process helped build university community buy-in for the strategic plan and its implementation.

The team notes that Strategy 2, Tactic 1 of the 2024-2029 strategic plan re-envisioned the academic review committee of the executive committee as the viability and feasibility committee. This committee is charged with the continual data and mission driven review of existing and proposed new programs as well as with assisting in the management of the provost's budget for new program initiation.

Team interviews with members of the viability and feasibility committee indicate that the work of the committee will be focused on conducting continuous data and mission driven reviews of existing university programs to assess viability (CFR 4.1 and 4.3). Interviews also confirmed that the committee will use data and the university's mission to assess the viability of proposed new programs. Finally, the committee will assist the provost in managing the budget for new program initiatives (CFR 4.6).

Team interviews with members of the board of trustees indicate that their committee structure was utilized to review the strategic plan 2024-2029 with the board's finance and investment committee taking a lead role. Interviews also indicated that the board viewed the strategic plan as a living document that would initially be reviewed on a quarterly basis.

In summary, Humphreys University has made significant progress in addressing the previously identified issues of strategic planning through the completion of a data and community informed five year strategic plan in a relatively compressed timeframe for implementation on July 1, 2024, the start of FY 2024-2025. Various members of the university community indicated that the strategic plan had goals that appear achievable inclusive of enrollment and revenue diversification goals, had cost estimates and implementation timelines for each tactic, provided processes for reviewing the viability and feasibility of new programs, included processes to help ensure alignment of budgetary and strategic priorities and timelines, and provided mechanisms for the review and modification of strategic tactics (CFR 4.6).

The team does, however, have concerns about the university's ability to implement and monitor the strategic plan; especially if the provost position is not filled in a timely manner (CFRs 4.6 and 4.7). The team notes that the current provost retires on June 30, 2024 and that the first year of implementation of the strategic plan 2024-2029 begins the next day. The team also has concerns that academic integrity might not be a significant factor in program reviews and that governance structures at the faculty and board levels of the university may not be properly aligned and defined to ensure that academic integrity is a priority in the implementation of the strategic plan. Finally, the team was concerned that not all academic programs (e.g., the ABLE and HMS programs) were subject to a margin analysis and that the need for two physical campuses (Stockton and Modesto) had not yet been assessed.

Based on the information provided by the university through documentation and interviews as well as the concerns listed above, the team finds that Humphreys University is in compliance with the key components of CFR 3.4. In addition, the team has provided several recommendations to assist the university in improving compliance with this CFR, which are provided later in this report.

SECTION III. OTHER TOPICS

None.

SECTION IV. FINDINGS, COMMENDATIONS AND RECOMMENDATIONS

Humphreys University is dedicated to supporting students and preparing them for meaningful careers and professions. The team found evidence that Humphreys University has met all of the WSCUC standards.

A. Commendations

The team makes the following commendations:

1. Humphreys University's financial situation has shown marked improvement since FY22 with growth in net tuition and fees, facilities rentals, and other income. Student enrollment grew by 20% between FY22 and FY23 and another 40% between FY23 and FY24. Growth has largely been in international students in the MBA-IT program and in teacher credential programs.
2. A new strategic plan has been developed and recently approved by the board of trustees, with implementation to begin in summer 2024. The data-informed strategic plan was developed by a dedicated committee of campus representatives after completing an effective SWOT analysis. It includes cost estimates and benchmarks for implementation. Faculty, staff, trustees, and administration appear committed to its implementation and ongoing evaluation.

3. Shared governance structures have been created over the last two years that have distributed authority more widely and appropriately across Humphreys University. The university is to be commended for these changes and for ongoing efforts to continue to develop its articulation of responsibilities and processes.
4. The Humphreys University community expresses deep and widespread commitment to their students and to providing education that centers career preparation and advancement.
5. A strong partnership has been developed between Humphreys University and Howell Management Services (HMS) that has led to an improved international student experience and an increase in enrollment.

B. Recommendations

The team makes the following recommendations for Humphreys University to strongly consider:

1. While the financial picture has improved, FY 24 will be the first year in which one-time non-recurring revenues are not accounting for budget surpluses. Continued monitoring and analysis is needed as Humphreys University implements the strategic plan to ensure confidence that the strategies and tactics are having the anticipated results. (CFRs 3.4 and 4.6)
2. Humphreys University has developed many nascent processes in support of shared governance and the maintenance of academic integrity. These processes need to be fully articulated, documented, and evaluated considering higher education best practices. (CFRs 3.10 and 3.11)
3. Humphreys University should define educational quality to be consistent with its mission and demonstrate academic integrity. Both the awarding of university credit for high school courses and the lack of specified connection to the associate of arts (AA) degree in the MOU with the ABL program are inconsistent with Humphreys' commitment to academic integrity. The university should establish formal structures such that academic standards are reviewed and applied consistently to protect the quality of its academic program and ultimately create a successful student experience (CFRs 1.2, 1.6, 1.7 2.2, 2.2a, and 2.3).
4. The work to develop the Board of Trustees' capacity needs to continue, along with the creation of formalized descriptions of the responsibilities of board committees that detail steps to evaluate how those responsibilities are being met. The team is concerned that the audit committee has not yet met with the auditor. The Board of Trustees should assert more attention to academic quality and educational visioning for the university. As the board continues to recruit new trustees, it would be useful to include recruitment of members with experience in higher education (CFR 3.9).
5. The expansion of the academic senate to include graduate programs and faculty has been an important step in the development of the shared governance model. The academic senate needs to continue its development as a voice for academic quality and educational visioning for the university. Further clarification and documentation of roles, authority, and reporting lines will help ensure there is consistency in upholding academic integrity (CFR 3.7 and 3.10).

6. Humphreys University is currently conducting its first search for a provost as the inaugural provost is retiring at the end of June. The timely hiring of a new provost is essential to the improvement of academic rigor and consistent academic processes and policies, including the implementation of the strategic plan, shared governance structure, and the use of metrics and standardized data. (CFRs 3.6 3.10, 4.6, and 4.7)

APPENDICES

There are no appendices for this SV report.