

REPORT OF THE WSCUC VISITING TEAM
SEEKING ACCREDITATION VISIT 3
For Institutions Seeking Initial Accreditation

TO RUDOLF STEINER COLLEGE
MARCH 4 – 6, 2015

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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. This report and the Commission action letter will be made available to the public by publication on the WSCUC website.

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SECTION I – OVERVIEW AND CONTEXT

A. Description of Institution and Visit

Located in Fair Oaks, California, Rudolf Steiner College (RSC) is a private non-profit institution established in 1976 to prepare and certify Waldorf teachers. The college is seeking initial WASC accreditation after being granted candidacy effective February, 2012. RSC is recognized by the Association of Waldorf Schools of North America (AWSNA) as a Waldorf Teacher Preparation Center offering a single master's degree in education, as well as a professional certificate the college calls the Waldorf Teacher Education Diploma.

Waldorf education follows the philosophy of anthroposophy and aspires to integrate an emphasis on art (painting, sculpture, craftwork, movement), a focus on the “bio dynamics” of the natural world, and an inquiry into the spiritual and social needs of each student. The college states in its catalog that its mission is to:

Provide a creative educational environment for men and women of diverse ages and backgrounds who seek a deeper understanding of the challenges of modern life and wish to develop new capacities as a basis for their life's work, for social service, and for cultural renewal.

Founded on the spiritual scientific work of Rudolf Steiner, the College provides programs that:

- *Awaken independent thinking and healthy judgment about the deepest issues of human life*
- *School powers of perception*
- *Cultivate and enrich artistic faculties*
- *Develop social sensitivity*
- *Strengthen capacities for practical life*

The vision of the college is

... to serve as a resource center for Rudolf Steiner's work, providing continuing education, fostering research, presenting workshops and conferences, and publishing and making accessible books and other related materials. A further goal is to serve the broader educational community and bring Rudolf Steiner's contributions into the dialogue on education and other issues of global concern.

Approximately 60 students are admitted to RSC's 48-credit MA degree with a Certification in Waldorf Teacher Preparation (with a focus on Early Childhood, Grades 1-8, and High School). The degree is available through several modalities, including full time, part time, hybrid (in-person and synchronous webinar), and summer/weekend. An additional approximately 180 students attend RSC's non-degree programs that account for roughly 50% of the college's revenue. Nearly half of the students are over 40 years old, over 80% are females, and approximately 40% report their annual income to be less than \$25,000. Nearly a quarter of the degree students are international students on visa. Because of program structure and financial aid eligibility requirements, only a very few students currently receive federal financial aid. The average overall tuition cost for the degree is roughly \$30,000.

The college employs seven full-time faculty members (five with some administrative duties), approximately 25 part-time or adjunct faculty, and 14 full-time administrative staff. Additional administrative support is provided to RSC through a shared services arrangement.

While Waldorf K-12 educational options were previously only provided in private schools, in recent years many publicly funded Waldorf charter schools have opened across the country. This charter school movement, coupled with overall concerns about the effectiveness of public education, has led to an increased interest in the Waldorf educational approach. Particularly as public institutions of higher education are beginning to explore the Waldorf approach as a potential enhancement to the more traditional approaches in education, RSC seeks

accreditation to achieve a recognized place at the table in conversations about contemporary education and pedagogy.

The most recent WASC Senior Colleges and Universities Commission (WSCUC) evaluation visit to RSC occurred in fall 2011, after which the college was granted candidacy status. Although the subsequent CPR visit was initially scheduled to take place in fall 2013, as a result of RSC's request to defer the visit and a change in WSCUC procedures for those seeking initial accreditation, the visit was rescheduled for March 2015.

RSC submitted its Seeking Accreditation Visit 3 Institutional Report to WSCUC on January 5, 2015, along with a number of support documents. The WSCUC team reviewed the RSC documentation and completed a summary worksheet in preparation for its team conference call conducted on February 10, 2015. During that call, the team discussed the RSC report, determined writing assignments, identified additional documentation needed, and developed a tentative list of necessary meetings for each team member during the onsite visit. On March 3 the team completed the final visit coordination and planning. On March 4-5, the team conducted onsite reviews of institutional documents and interviews with administrative personnel, trustees, faculty, staff, and students.

Between the fall 2011 evaluation team visit and the March 2015 visit, RSC experienced significant and fundamental changes. Understanding these changes provides a critical context for this report. The more significant changes include:

- Appointment of a new chief financial officer (March 2014) following a period of financial management turnover.

- With the exception of one board member, the resignation of all board members and the creation of a new governing board and new board chair (December 2014).
- Contractual agreements that resulted in a change of ownership of the 13 acres of property previously owned by RSC that serves as the central campus of the college, along with the property's buildings, improvements, furniture, fixtures, and equipment (August 2014). This change of ownership was a very complex transaction, the end result of which is that:
 - A limited liability company (LLC) holds the property and was established solely to manage such property. RSC is leasing the property from the LLC in a 30-year lease in which the LLC “acknowledges its support of the use of the Campus for the growth and development of its users consistent with the principles of anthroposophy.” All decisions regarding the property reside with the sole LLC manager. The current LLC manager also serves as RSC's board chair.
 - RSC holds a 51% economic interest and 33% voting interest in the LLC. The impact of this is that RSC is now only 51% liable for the outstanding balance on the property's encumbrance and operating and maintenance costs. The team was not able to ascertain that there is any practical value to the minority voting interest given the absolute authority the LLC manager has with respect to the property.
 - A newly formed non-profit educational organization (Meristem) holds a 49% economic interest and 66% voting interest in the LLC. Meristem plans to offer services to students with autistic spectrum disorders. Meristem will be sharing the use of the property with RSC and plans to bring in its first class of students in fall 2015.
- Appointment of a new RSC Chief Operating Officer (August 2014) who reports directly to the new RSC board and who also serves as the CEO of Meristem.

- Creation of a shared services LLC (August 2014) established to hire certain administrative staff to be shared by RSC and Meristem. Costs for such services are divided between the two entities according to usage. The executive director of the shared services company is also the chair of RSC's board.
- Appointment of a new president of RSC (September 2014).

After significant inquiry and review of documents, the team understands that the catalyst for these transactions was an urgent need for RSC to pull itself out of a financial and business management crisis that threatened RSC's existence. The governing board sought a variety of potential solutions to its financial predicament and concluded that this arrangement was in the best long-term interests of RSC. The transactions bring to RSC much-needed savvy business and financial leadership from people who convincingly expressed a genuine passion for the mission and educational purposes of RSC. Equally important, the new president is highly competent with strong leadership qualities and a clear academic vision for a refurbished RSC.

B. The Institutional Report: Quality of the Report and Evidence

The team review of institutional materials and meetings with RSC representatives indicated strong evidence of widespread participation in the self-study process and report preparation by representatives of RSC. The report was organized by the WSCUC standards and CFRs. The team found the report to be refreshingly honest and reflective, highly informative, well written, and comprehensive.

C. Response to Previous Commission Issues

1. Adopting and implementing a credit hour policy

The March 8, 2012 Commission action letter noted that RSC was “out of compliance with WASC policy and federal regulations regarding credit hours,” a situation which required “immediate steps,” both in order to apply for federal financial aid and to conform with WASC requirements. After RSC submitted a progress report demonstrating compliance, staff approved that report on May 21, 2012, and the Commission granted candidacy effective February 24, 2012.

The 2012 Commission action letter also required RSC to “establish procedures for the periodic review of credit hour assignments to ensure they are accurate and reliable.” Those procedures and the current status of RSC’s credit hour review are addressed in Section II.B.1 of this report.

2. Achieving greater financial sustainability

The 2012 Commission action letter expressed ongoing concern over the continuing financial challenges that RSC had experienced during the past several fiscal years. That letter stated: “The Commission stresses that it will not grant initial accreditation until an institution can show successive years of a balanced budget or operating surplus and can demonstrate it is financially stable and sustainable for a period of five successive years.”

Since that time RSC experienced operating deficits for the fiscal years 2012 and 2013, and only in 2014 did the institution experience a small operating surplus. The financial sustainability issues became so exigent during fiscal year 2014 that the institution entered into

the transactions outlined above. This issue is discussed more fully elsewhere in this report, especially in sections II.A.1, and II.C.3.

3. Developing the governing board

The 2012 Commission action letter indicated that “changes are needed in the board’s bylaws to conform to WASC expectations ... [and WASC] expects the board to establish mechanisms for assessing how well it meets its responsibilities, and then use the results of that assessment to enhance board effectiveness.” Between the date of the action letter and the creation of the new board, little progress was made in this area. However there is evidence that the new governing board will make significant progress on this issue. There are also areas for significant concern. These issues are addressed in section II.A.

4. Improving assessment, program review, and institutional research

The 2012 Commission action letter highlighted the central importance of program review and institutional research. In that letter, although the Commission recognized that RSC was in the midst of planning a robust program review process, the Commission described the process as “untested.” The Commission directed RSC to complete a “full program review,” “develop and implement appropriate assessment strategies and provide direct evidence of students’ achievement of program and institutional outcomes,” and focus on “building a robust institutional research capability that enables Rudolph Steiner College to gather, analyze, and interpret data for use in improving educational effectiveness.”

While a full protocol for program review was developed, the process has not been fully implemented, despite the Commission’s charge to RSC. A largely qualitative and anecdotal review of student learning and courses was undertaken, and limited data were collected on

student demographics, student achievement, and student course evaluations. Additionally, student demographic data were organized into a table to allow for improved management and reporting.

In its self-study, RSC reflected on its failure to fulfill the Commission's expectations for a more robust, evolved set of assessment processes and structures by this point in its candidacy. RSC acknowledged that its recent financial crisis had reduced its commitment of resources and energy to this issue. Additionally, RSC's faculty culture initially resisted formalizing processes that, in past practice, had been what the college called, "traditional, qualitative, relationally-based" reflections on student learning and teaching. However, since early 2014, RSC has made some progress toward its goals for improving assessment, program review, and institutional research. While details about these functions and activities are addressed most fully in section II.D.2, a synopsis of the college's activities in this area follows:

- Adoption of a cloud-based integrated data system, which is being used at RSC to track student enrollment, attendance, courses, credits, and course completion data.
- Exploration of a new learning management system that can also serve as a gateway to student assessment and institutional effectiveness data.
- Development of links between the data system and learning management system to ensure shared information.
- Transfer of the management of the learning management system to the IT department under the direction of the MA Chair, to ensure development of a data warehouse of consistent, reliable, and accessible information on student learning and achievement.
- Evaluations and surveys conducted through the Institutional Research Office focusing on summer courses, conferences, hybrid course students, employees, and faculty.

- Submission of data to the Integrated Postsecondary Education Data System (IPEDS) for analysis, leading to consistent, reliable and accessible data, on student and faculty demographics, retention, persistence and graduation, and faculty workload.
- Collection and recording of student and course data by the Registrar's Office in anticipation of report preparation.

Overall, the college has made progress in its efforts to improve assessment, program assessment and institutional research, although several significant challenges remain, as delineated section II.D.2.

SECTION II – EVALUATION OF INSTITUTIONAL COMPLIANCE WITH WSCUC STANDARDS

A. Standard 1: Defining Institutional Purposes & Ensuring Educational Objectives

1. Institutional Purposes (CFRs 1.1 – 1.2)

RSC has a published and formally approved mission statement, vision and values that clearly define its character and ways in which it contributes to the public good. (CFR 1.1)

While its educational objectives are widely recognized throughout the institution, RSC is not yet able to demonstrate that students are achieving these objectives. The team was able to locate data reflecting retention and graduation measures only through a link to the college's Bureau of Postsecondary Private Education (BPPE) report. Although the college has thus technically made available to the public these data, the team is concerned that interested members of the public would be unable to find such data, because the data reside in a public location not obvious to even the evaluation team members. (CFR 1.2)

2. Integrity and Transparency (CFRs 1.3 – 1.8)

Review of RSC’s policy on academic freedom, published in the college catalog, reflects a strong commitment to academic freedom for faculty, staff, and students. The team observed through its meetings with staff, faculty and students a solid culture that welcomes discussion of diverse ideas. (CFR 1.3) Consistent with its commitment to academic freedom, RSC has a diversity policy that reflects a belief in the principles of inclusiveness and diversity. The team found many examples of this commitment put into practice: course syllabi include diversity statements that address how each course and instructor approaches the question of diversity; RSC recently hosted a cultural competence workshop on understanding Islam; and the Academic Senate established a diversity committee to help further the implementation of RSC’s diversity policy. Although the team found a commitment to diversity within its academic programs, it did not find the composition of the board, faculty, and staff reflects this commitment. The college is encouraged to work hard to create greater diversity in its board, faculty, and staff. (CFR 1.4)

The WSCUC Criteria for Review 1.5 expects the college to “operate as an academic institution with appropriate autonomy.” The evaluation team is concerned that the intertwined relationships with Meristem, the services company, and the property-holding LLC (as described in section I.A) jeopardize the autonomy of RSC. The catalyst for the entangled connections appears to have been grounded in a good faith effort to rescue RSC from impending economic failure. Board leadership explained that the current arrangements are intended to be transitional while RSC gains capacity to become an autonomous organization that applies sound business and financial practices. As a result, during this transition period, the college is significantly impacted by decisions made by the CEO of Meristem who also acts as the COO of the college and who does not report to the college’s president, but, instead, reports directly both to the board

of Meristem and to the board of RSC. In addition, decisions with respect to RSC's specific use of the campus appear to be outside the control of RSC and, instead, are entirely controlled by the manager of the holding company LLC.

Another concern regarding the autonomy of RSC involves the many roles of the RSC board chair. He is the RSC board chair, the sole manager of the property LLC, and the owner and executive director of the shared services company. The chairman of the board is also a major donor to RSC. In addition, the RSC board does not appear to be entirely independent from the Meristem board because of related family members serving on each board.

The team is concerned that the college is not able to make independent decisions with respect to areas common to academic institutions, such as use of facilities for educational purposes. For example, it became evident to the team that decisions such as the location and size of the library facilities and the best facilities arrangement to create an engaged academic community cannot be made independently because of the many roles of the board chair. The same lack of autonomy exists with respect to budget allocations among academic, co-curricular, and administrative needs. (CFR 1.5)

Recommendation: Make all necessary changes to ensure institutional autonomy and comply with the WSCUC Independent Governing Boards Policy.

Through its meetings with the RSC leadership, the team also is concerned that the understandable focus on the business and financial concerns of RSC is leading to lack of balance with academic considerations. The team is concerned that the existing bifurcated leadership of the organization may not lead to the proper balance between academic and other needs. (CFR 1.5)

Recommendation: Ensure that the academic development of RSC is given significant and sufficient weight relative to its business and financial concerns, recognizing that institutions of higher education have unique needs and operational best practices.

In its publications, RSC describes its academic goals, programs, and services. Although the costs to students are accurately reported in accessible materials, the team found these unduly complicated to understand without a detailed explanation by a staff member. While there is only one degree program offered, because of the variety of modalities and the ability to take courses without pursuing a degree, a prospective student is presented with 16 different documents from which to select. The team encourages the college to explore ways to make this information more readily understandable in order to fully satisfy the spirit behind this accreditation expectation.

The team located appropriate policies addressing student conduct, grievances, and human subjects in research, as well as regarding financial refunds. (CFR 1.6)

Due to challenges in accurately administering financial aid (discussed in section II.C.1), financial aid policies are under repair and being administered by an external organization.

The team reviewed the student complaints files and found evidence that RSC has responded to complaints in a timely manner and with fairness. The team is encouraged because RSC is moving towards a practice of recording complaints and dispositions in a more formal fashion. (CFR 1.7)

RSC has had significant issues with respect to practicing sound business practices in a broad spectrum of university affairs. The team did not find a lack of transparency or integrity contributed to this issue. Rather, prior to the August 2014 transactions and the entrance of the new leadership (board, CFO, COO, and president), the college simply did not have the capacity

or know-how to apply sound business practices. This was particularly true in financial management, discussed in detail in section II.C.2. It was this weakness that brought RSC to the point where it needed to enter into the restructuring transactions of August 2014.

It is clear to the team that the new leadership brings to RSC a high level of experience and competence in sound practices. Changes have already been made, such as working to collect accounting receivables and establishing faculty evaluation procedures. The team found some policies do not yet reflect the revised structures resulting from the August 2014 transactions. One example is the HR Hiring and Evaluation Policies for Faculty and Staff. The team encourages RSC to review all policies to ensure consistency with the current structure. The team recommends that RSC leadership continue its commitment to progress in implementing sound business and academic practices. (CFR 1.7)

In communications with the evaluating team, RSC exhibited a high level of openness and appears to take the accreditation review process seriously. The team commends RSC for its candor and transparency, identifying its challenges with an impressive amount of honest self-reflection.

B. Standard 2: Achieving Educational Objectives Through Core Functions

1. Teaching & Learning (CFRs 2.1 – 2.7)

Based on reviewing requirements for its single graduate degree program, along with example syllabi, the team found that RSC's academic expectations are typical for a master's degree in education (although perhaps more typical of those for an MEd than for an MA). To earn a master's degree, RSC students must meet the requirements for a teacher education diploma with an appropriate specialty, plus complete additional course work developing

students' understanding and performance of scholarly work. The number of faculty teaching both diploma and additional degree requirement courses allows for small class sizes and significant individual supervision, so the team found the degree program to be adequately staffed. Despite the small number of students enrolled in the master's degree program, the team found that there are sufficient course offerings for these students because of overlap of degree program courses with those required for diploma programs that enroll more students. (CFR 2.1)

While the team found that the RSC catalog adequately describes entry-level requirements and mandatory levels of achievement for students, the team also found RSC's credit hour weightings for courses to be confusing and inconsistent. RSC's curriculum is made up of courses designed as discrete modules and assigned varying levels of credit, based on "micro units." This leads to unit weightings ranging from .25 through 9.9 units per course, with no highly typical course unit weighting in any program.

As RSC's self-study notes, this unevenly and somewhat inexplicably weighted course structure "presents challenges in accurately tracking and assessing student attendance and progress, and in developing syllabi and rubrics" (page 52). The team also found that the micro unit structure contributes to difficulties in rationalizing faculty workloads and potentially adds to the faculty's advising burden, because students report that they do not understand the course unit structure.

While RSC leadership has begun working with the Academic Senate to convert the micro unit structure to a more standardized weighting model, the President and MA Chair told team members that they anticipate an 18-month process would be required to substantially revamp course unit weighting. The team found this timeline concerning, given that other planned

curricular reforms and improved assessment measures depend upon changes to course weighting. (CFR 2.2)

The team examined vita for RSC faculty and determined that most full-time faculty hold either a doctoral, professional, and/or master's degree, as do many part-time core and temporary adjunct faculty. Those few faculty members who do not hold graduate degrees have advanced education and/or creative accomplishment in their specialized areas. While the team had some concern based on a few faculty members not evidencing sufficiently recent professional development work, overall the team believes the faculty to be well qualified. (CFR 2.2b)

In addition, based upon discussions with faculty and upon review of syllabi and materials for critical courses required only of master's degree students, the team found that RSC, through its courses and its culture of intellectual exploration and flexibility, exposes its master's degree students to a range of philosophical and methodological approaches relevant for contemporary studies of education. RSC also develops those students' capacities for research that can contribute to broad and advanced scholarship, as well as to a high level of professional practice. Through conversations with both faculty and students and by examination of course outcomes (including theses, practicum reports, and creative works), the team found that faculty engage students at a high level, challenging them and providing them with feedback to continually learn and improve upon prior knowledge. (CFR 2.5)

Based upon examining RSC sample course syllabi and its draft of a preliminary program assessment document, along with conversations with academic leadership, the team determined that RSC's incorporation of student learning outcomes (SLOs) and standards of performance at the course, program, and institutional level are still nascent, as is program review. The faculty through its Academic Senate has collectively facilitated development of SLOs at all levels.

However syllabi and policies do not consistently reflect SLOs, even though other planned curricular reforms and improved assessment measures depend upon routine incorporation of SLOs at all levels. (CFRs 2.3, 2.4)

In addition, while RSC faculty and leadership share an understanding of the value and importance of mature measures of assessment of student performance, those are not embedded in standards used for evaluation and the infrastructure for assessment is not in place. As for program review, there is only a draft document analyzing preliminary and limited data. The issue of assessment is covered in more depth in section II.D.2. (CFRs 2.6, 2.7)

Recommendation: Standardize credit unit assignments and both implement and publicize SLOs at the institution, program, and course levels, recognizing that other planned curricular reforms and improved assessment measures depend upon changes in these areas.

2. Scholarship and Creative Activity (CFRs 2.8 – 2.9)

Based upon discussions with RSC faculty and leadership and after examination of faculty's scholarly publications and creative works, the team found that faculty engage in meaningful and respectable scholarship and development of creative works and that they receive adequate support and encouragement from RSC. RSC's policy on support of faculty research and creative works, which appropriately funds professional development activities without excessive restrictions, is clear. And faculty reported feeling supported in their research and creative endeavors, both monetarily and by release time and recognition for their achievements. In addition, RSC supports both domestic and international outreach activities, which, though primarily focused on recruitment and fostering support for Waldorf teaching, also expose faculty to professional enrichment, as well as garnering prestige for RSC.

Although many faculty members' scholarly publications were in specialized journals particularly focused upon the philosophy and teaching methodologies developed and promoted by Rudolf Steiner, numerous faculty work products were published and/or distributed by other alternative or mainstream presses or outlets and/or were designed for a wider audience. In addition, pioneering programs and initiatives developed by the faculty and supported by RSC testify to RSC's intention to encourage faculty in establishing, maintaining, and furthering RSC's own reputation as an incubator for new ideas in the field of education.

The team found that the spirit of flexible, open-ended humanistic inquiry and creative expression fostered by the philosophical emphasis of RSC extends into its curriculum and classrooms. Students attested, in conversations with the team, that service activities of faculty align with the subject matter of RSC's curriculum. The team notes that the faculty's dedication to scholarship and creative work is particularly exemplary, given that all are at-will employees whose non-teaching endeavors are not requirements for tenure or promotion.

The team found that RSC's leadership helps to foster enthusiasm for professional development in a variety of forms, as an aspect of the organizational culture. However, the team was not able to evaluate the adequacy of the faculty handbook in addressing any policies relevant to scholarship and creative works, because the former version of that handbook no longer is extant; a replacement handbook remains under development. (2.8, 2.9)

3. Student Learning and Success (CFRs 2.10 – 2.14)

The team was able to review only limited data related to student learning and success at RSC. Systems for recording relevant information and appropriately disaggregating data are under development, but they are not yet sufficiently operational to provide meaningful grounds for analysis that could lead to improvements in student achievement. Based on discussions with

leadership, the team learned that staff have purchased and are customizing appropriate tools for collecting data and that staff are re-evaluating existing tools with the aim of choosing and/or developing systems that will substantially improve RSC's ability to parse data in useful ways.

The team was advised that these tools should be effectively deployed in less than a year. However, because there currently is no on-site Institutional Research specialist on staff, the utility of such tools as the basis for analysis and improvement would be severely limited. Issues concerning the role of institutional research at RSC are covered in more depth in section II.D.2. (CFR 2.10)

The team had multiple opportunities both to meet with students and to view outcomes of their coursework and related activities at RSC. Based upon those experiences, the team found that RSC offers exemplary co-curricular activities, particularly for international and residential students, but also for students who live off campus, including those with families. Students also reported that informal mentoring and academic and non-academic advising by faculty is commonplace, widely available, and much appreciated. Students noted that monthly student cohort meetings are particularly supportive and also complimented the formal system for assigning advisors and closely monitoring student progress.

In response to questions about RSC's pre-admission information, students reported RSC meeting or exceeding their expectations and providing all essential information. However, in its review of RSC's website, the team noted that information on the master's degree program is somewhat buried and difficult to distinguish from information about diploma programs, with no coverage of the graduate degree's distinctive benefits, advanced goals, and orientation toward scholarly preparation for professional advancement and/or further graduate education. Catalog

coverage of the important content distinctions between diploma and degree also is limited. In discussions with students who intended to earn the master's degree but were still engaged in preparatory coursework common to requirements for the diploma, the team found that those students do not anticipate that their later degree studies will expose them to alternatives to the Steiner philosophy and Waldorf methodologies. This lack of awareness suggests that degree advising at RSC does not expose master's degree students to one of the fundamental purposes of their studies until quite late in their degree work.

The team also reviewed a student satisfaction survey with generally positive responses and the student handbook, which adequately covers appropriate topics and policies. Formal support services, while limited because of RSC's size, appear to be sufficient to meet the needs of students. Although RSC enrolls few transfer students, there are adequate policies and procedures in place for processing their requests. Monitoring the confidential email messages to the team did not uncover any significant, pervasive problems among students. Rather, students typically complimented both the learning experiences at RSC and their overall satisfaction with campus life, which they reported supported fellowship and artistic endeavors. (CFRs 2.13, 2.14)

There is one area of student support services highly relevant to student success for which the team did not have access to sufficient information about: the campus library. In December 2014, prior to the team's visit, the library building experienced a water break from a fire sprinkler that caused the facility to be closed. When the team visited, the library still was closed, and the part-time staff librarian was, as a result, on an indefinite hiatus. Although online database services and other online library resources (including the Rudolf Steiner archives) remain available, RSC no longer provides an interlibrary loan service. Students, requesting extended library hours, noted to the team the multi-purpose value of the library: for research, as a space for

study, for activities such as music practice, and for fostering the campus community. Students and faculty both anticipate a timely re-opening of the library.

However, the team was not able to determine the timeline for library re-opening, nor plans for its future staffing, nor the scope, relevance, and currency of its collection. What the team did learn is that the space that had been devoted to library operations might be both moved and reduced, possibly, in part, because of the different goals of Meristem and RSC and the fact that RSC no longer controls the space allocation on campus (per the discussion in section I.A.). (CFRs 2.13)

Recommendation: Provide sufficient library resources, including appropriate space, staff, and collections.

C. Standard 3: Developing and Applying Resources and Organizational Structures to Ensure Quality and Sustainability

1. Faculty and Staff (CFRs 3.1 – 3.3)

RSC currently employs sufficient full-time and part-time faculty to support its current educational programs. The institution's faculty is adequately prepared and has sufficient experience to meet the instructional staff requirements for RSC's current program. The topic of faculty and faculty development is addressed more fully in section II.B.

Since 2011, the staff, including the senior staff, has experienced an almost complete turnover, with many changes taking place within the past eight months. The team found that in many ways the institution appears to be a newly established institution, due to the number of senior and mid-level staffing changes that have occurred. Many of the new staff, including the

newly appointed president, appear to be highly qualified, although a number do not have significant direct experience in higher education.

This lack of direct higher education experience is likely to present challenges to these new staff, as they learn all the new nuanced requirements of the industry. An example of a consequence of staff having insufficient expertise is the difficulty that RSC experienced attempting to successfully implement the disbursement of Title IV funds after Candidacy was granted. A Department of Education program review conducted regarding the administration of federal funds resulted in a number of significant negative findings. As a result, the institution now has outsourced its financial aid awarding and management. The team also observed that sufficient training in important areas, such as FERPA and Title IX requirements, is not occurring. Professional development opportunities could address such deficiencies, providing staff members with sufficient continuing educational opportunities to enable them to excel in their respective areas and to apply best practices.

RSC could best address the challenge of new and relatively inexperienced staff by equipping the staff with adequate resources for training, resources that professional associations supporting higher education could provide. All levels of organization, from board members to mid-level staff could benefit from participation in those associations. A few examples of these organizations include: the Association of Governing Boards (AGB), the National Association of College and University Business Officers (NACUBO), and the American Association of Collegiate Registrars and Admissions Officers (AACRO). (CFR 3.3)

Recommendation: Ensure that RSC administrative leadership and staff actively participate in relevant higher education associations and organizations to learn about and benefit from sound strategies and proven practices for colleges and universities.

As stated earlier, numerous staffing changes occurred following the close of the 2014 fiscal year. At May 31, 2014, 52 staff members were employed, and at the time of the team's visit, RSC employed 20 staff, with 20 also employed by the shared services company. Even in spite of a significant decrease in staff, the morale of the staff appears to be positive, as many staff members expressed to the team their belief that improvements and forward movements no longer are just talk, but actually are taking place.

As a result of the August 2014 transactions, a services company now provides RSC with operations-related staffing. Shared services include development; marketing; accounting and financial services; facilities and facilities management; information technology services; contracting for insurance and other outside services; and human resources. The services company provides shared services for Meristem and RSC organizations on a pro rata basis, and the services company is responsible for its own policies for hiring, training, and disciplining its employees.

RSC has a large number of policies regarding employees, and these are detailed in the Employee Handbook. The employee handbook applies to both staff and faculty, with very few faculty-specific policies. As of the date of the visit, there were no evaluation and promotion policies specific to faculty members. Faculty members are considered staff, and they are at-will employees with no formal evaluation criteria or evaluation/promotion process. The team reviewed draft faculty policies and encourages RSC to work towards finalizing those.

Staff evaluations and formal performance improvement practices are not in use. Staff, as well as human resources personnel, reported that this has been a continuing expressed desire, but such practices have never been implemented. The team encourages RSC to implement a process for staff evaluations.

2. Fiscal, Physical, & Informational Resources (CFRs 3.4 – 3.5)

The institution has a history of operating deficits, except in the case of 2014, when the institution experienced a small increase in unrestricted net assets of approximately \$10,000. The new management team appears to be much more disciplined in its commitment to financial sustainability than has previous management teams, and the team believes that deficits are much less likely to occur than in the past. A number of significant cost-containing measures have taken place: the hiring of a qualified CFO, the reduction of operating expenses through the shared services agreement with Meristem, and an absolute reduction in the total number of staff serving the entity by at least 10 employees.

However, time will tell, and additional years of net asset increases are needed to demonstrate that financial sustainability has become a reality. Cash flow from operations paralleled the financial reports and was negative during FY 2012 and FY2013. However, cash flow turned positive by \$46,000 for the year ending on May 31, 2014. The institution's investment reserves decreased from approximately \$940,000 in 2012, to \$795,000 in 2014. (CFR 3.4)

Recommendation: Become a financially sustainable institution and operate without annual deficits through 2016 and beyond.

Board Audit and Finance Committees are operational and appear to take their roles seriously. Independent financial audits are conducted by a qualified auditing firm at the conclusion of each fiscal year, May 31st. The institution's audit firm was chosen by the Board of Trustees to continue, at least for another year. The Finance Committee, under the chairmanship of an outside board member, is active and has taken substantial ownership of the institution's finances and business practices. One of the Finance Committee's goals for the year is better financial reporting, and the internal reports appear to provide more useful management-level information than ever before. For example, RSC now has a comparative financial report that shows the last year's final results, along with the current and following year's budget projections. The forecasts appear to be based upon reasonable forecasts of net tuition from students and conservative forecasts for charitable giving. (CFR 3.4)

Budgeting and resource allocation processes appear to be responsive to the needs of the institution, but they are complicated because both the president and the COO report to the board. As a result, some of the decisions that traditionally are made at the presidential level are made at the Board of Trustee level. The Board established this organizational structure to capitalize on the limited number of senior staff and because of the great extent of improvements needed. However, the practice may have inadvertently created resource allocation issues that may not optimally support the academic enterprise. (CFR 3.4, 3.7)

The campus on which RSC is located is more than sufficient for the size of its programs. RSC now shares the facilities of the campus, containing building space of approximately 32,000 square feet, with Meristem. Even with sharing, both entities certainly have sufficient space—at least in the near-term, to deliver the programs that they each offer at the current time. However, planned growth by both users of the campus may strain the existing facilities. While many of the

buildings have been built within the past fifteen years, very little deferred maintenance has occurred due to financial pressures. However, the institution now has committed to begin reversing this trend. A number of deferred maintenance projects were underway at the time of the team's visit. (CFR 3.5)

Recommendation: Take steps to preserve RSC's access to sufficient and appropriate space for its educational and operational needs. (CFR 3.5)

With regard to information resources, the uncertain status of the library (discussed in section II.B.3) affects not only students, but faculty and staff as well.

With regard to IT, the current campus infrastructure appears to be sufficient to meet the need of the existing requirements. Bandwidth in and out of the campus is relatively small for an institution, but the bandwidth seems to be adequate for the number of users on the campus. Most Internet connectivity for offices is provided by older wiring technologies and so probably will not provide sufficient backbone to continue serving the institution as it embraces more technology to deliver its services and educational programs. The campus has wireless connectivity in most locations, but not in all.

Continued improvements likely will be required as RSC becomes increasingly reliant upon technology to support educational, administrative, and educational services. Administrative computing was planned to move to an integrated system as far back as 2012, but that change never was implemented. The new management team now has abandoned that idea and implemented a number of standalone systems as the administrative systems for the college.

New systems have improved campus collaboration and communication through document sharing, but training remains an issue. A synchronous meeting application is used to

conduct synchronous instruction in the hybrid modality, and it appears to be sufficient for the current level of synchronous off-site instruction. Additional training for faculty members likely will be required if the hybrid modality expands. (CFR 3.5)

3. Organizational Structures and Decision-Making Processes (CFRs 3.6 – 3.10)

WASC Criteria for Review 3.6 anticipates that an institution’s leadership “is characterized by integrity, high performance, appropriate responsibility, and accountability.” The materials reviewed by the team as well as onsite discussions revealed an admirable level of integrity and high performance. However the team found the current organizational arrangements reflect responsibilities and accountabilities inconsistent with those expected in higher education. Although the team was provided with a concise organizational chart, the team remained confused as to who has the authority to make many decisions. This confusion was caused both by the complexity of the organizational structure and by the fact that the COO does not report to the president but instead reports directly to the RSC board. Consistent with job descriptions reviewed by the team, the RSC Institutional Report states that:

The President of the Meristem Center is also the Chief Operating Officer of RSC, responsible for operations, non-academic staff, and approving major RSC operating decisions. He consults directly with the institution’s major donor. He meets daily with the President and provides review and final approval for major RSC operating decisions. A Leadership Team of RSC, President, COO, and CFO, meets weekly to coordinate and plan work. (page 64)

The organizational chart provided to the team indicates that the president has responsibility for the functions more typical of a provost: admissions, registrar, financial aid,

library, institutional research, academic programs, and the faculty. The COO is responsible for all other functions of the college, including fundraising, finances, events, housing, human resources, marketing, and IT. Some of the services identified as ones under the authority of the COO have or are planned to move into shared services managed by the board chair in the chair's role as manager of the services company.

When posing various potential decision-making scenarios to the president and COO, the team observed that the COO has the official authority for decisions that in higher educational institutions typically belong with the president. For example academic technology is controlled by the COO, even though this directly impacts pedagogy and student learning. Should the president and COO have a different view on an issue pertaining to academic technology, it is unclear which of those two leaders would make the decision.

The same lack of clarity is true with respect to the use of services provided by the services company. Although the president of RSC has the authority to decide not to use a resource provided by the services company, the result of such a decision would be to force Meristem to shoulder all of the expenses of that service. Although technically possible, the reality is that making such a decision has the possibility of RSC injuring the organization upon which it is partially dependent and that is run by RSC's COO. In addition, the RSC board chair is also the executive director of the shared services LLC that hired the shared services staff. When discussing the potential reality of disagreement, neither the COO nor the president knew quite how it would be handled. The team believes that this unclear arrangement of authority puts RSC's president in an untenable situation long term and leaves decision-making quite ambiguous. (CFR 3.6)

The team also is concerned that operational considerations will be given greater weight than educational effectiveness (CFR 3.7)

Although RSC has a designated “president,” the responsibilities of the president are not currently consistent with presidential responsibilities, because the decision-making ability of the president is limited to only one part of the college’s business. From the team’s review of all the organizational documents and its discussions with the leadership and board, it appears to the team that the board chair is functioning more as both the de facto college president and the board chair, while the designated president is functioning more as a provost. Given the role of the board chair as more akin to a president, it does not appear that there is a separate body that provides the expected fiduciary oversight. (CFRs 3.6, 3.7, 3.8)

Recommendation: Provide the president with the authority and management responsibilities appropriate for the CEO of an institution of higher education.

RSC’s institutional report indicates that RSC’s CFO provides financial oversight to RSC and oversees all aspects of business and finance operations. The CFO reports to the COO, although the CFO also consults regularly with the president. Although the CFO also provides services to Meristem and the services company, the team was assured that the CFO’s primary responsibility is to RSC. (CFR 3.8)

The board currently consists of nine members and has plans to increase in size, with a particular desire to add people with a working knowledge of higher education. The level of the board’s involvement in RSC is understandable, yet it is ultimately troublesome in the long term. Criteria for Review 3.9 anticipates that RSC’s governing board operate in accordance with WSCUC’s policy on Independent Governing Boards. The team is concerned that the many

different positions of responsibility of the board chair and the relationship of several board members with Meristem may result in the RSC board being unable to fulfill the expectations of the policy on Independent Governing Boards. (CFR 3.9)

Recommendation: Transition the governing board's role toward assuming a fiduciary and strategic, rather than an operational, role.

Criteria for Review 3.9 also expects a governing board “exercise appropriate oversight over institutional integrity, policies, and ongoing operations....” The team was highly impressed with the board’s commitment of both time and skills to provide essential assistance to ensure the health of the college. However, the level of current involvement is at a very micro level. The board currently is very involved, and board members are the apparent decision-makers in such areas as hiring below vice president level, selecting the budgeting system, and allocation of physical space. Ultimately, the board members will need to step back and become fiduciaries, leaving operational and managerial decisions to the president and the president’s senior leadership team.

Recommendation: Given the importance of strategic direction, the team recommends that RSC transition the governing board's role towards assuming a fiduciary and strategic, rather than operational, role. (CFR 3.9)

The team found RSC’s academic senate is active and, according to its self-study (page 70), is responsible “to ensure faculty participation in the formulation, discussion, implementation, and evaluation of all academic matters.” (CFR 3.10)

D. Standard 4: Creating an Organization Committed to Quality Assurance, Institutional Learning, and Improvement

1. Quality Assurance Processes (CFRs 4.1 – 4.2)

For RSC the core issue in quality assurance is the development of a sustainable and evidence-based set of structures and processes centered on RSC's mission and educational objectives. Given the anthroposophical foundations of Rudolph Steiner's thinking and the resulting nature of a Waldorf education, the issue of participatory self-reflection is at once a strength and weakness of RSC as an institution of higher education.

As a strength, the interpersonal, supportive, and contemplative foundation of Waldorf education offers both students and faculty powerful opportunities for transformation. However, as a result of what might be called a "Waldorf culture," on one level, the institution has been slow to develop a deliberate set of formal quality assurance practices (either academic or non-academic) driven by data, rather than by anecdote. Additionally, that culture, coupled with the intimate size of the institution, created obstacles to the timely creation and implementation of quality assurance procedures, such as periodic program review, new curriculum and program approval processes, and other forms of persistent evaluation, such as the collection, analysis and interpretation of student learning over time.

The Academic Senate has responsibility for program review, curriculum approval, student learning assessment, and academic issues. The Senate prepared a program review protocol in 2011, but it was only minimally implemented, and findings for the MA program were reviewed in draft form by the Academic Senate and shared with the team.

Since the last WASC visit, RSC has made an explicit commitment to create a “deliberate set of quality assurance practices” and has made some progress in developing a skeleton framework of regularized evaluation and data collection. However, actual implementation has been uneven, and not always consistent, in part because the creation of an institutional data collection warehouse has not gone smoothly.

RSC has begun to use systems to collect demographic data, such as disaggregated data on race, gender, retention, persistence, and program standing. The systems are configured to collect, track, and report student learning outcomes data by linking syllabi and measureable learning outcomes. The college also has solicited information from the Association of Waldorf Schools on North America (AWSNA), teacher education institutions, and from Antioch University, New Hampshire, which is the only accredited MA-granting Waldorf institution in the United States.

In undertaking these activities, Rudolph Steiner College has begun to improve its alignment with best quality assurance practices. However, RSC has some substantial work to do in the future to meet the institution’s need to develop dependable, stable, and harmonious structures and practices to enable institutional planning and regularized evaluation of the RSC’s educational effectiveness (CFR 4.1)

Examination of RSC’s work on quality assurance issues and of the difficulties associated with its efforts up to this time, point to a basic weaknesses in the Institutional Research Office. Currently, the college employs a part-time institutional research director, whose job is to organize and analyze survey, demographic, and other data in support of the college’s need to evaluate efforts in student learning and support. A continuing problem with the quality and consistency of data made available to the campus suggests the institution needs to improve its

institutional research capacity. While both the Academic Senate and the administrative leadership team support the need to use data to inform decision-making, the current institutional research function is not up to the tasks that are ahead if RSC is to meet the requirements of WASC accreditation and the expectations of other entities, such as the Department of Education.

It is unclear to the team whether some of the difficulties arising in this area may be attributable to the “shared services” structure in which the institutional research director is placed. The team encourages RSC to ensure that data are disseminated in an efficient manner to internal and external stakeholders and then meaningfully analyzed, interpreted, and incorporated into established and regular activities, such as program and institutional review, program and strategic planning, and evidence-based decision-making. Ensuring that the IR Office is working effectively and efficiently to provide data that is at once accurate, meaningful, and centered in the college’s mission and commitments, is central to RSC’s future strategic planning and educational effectiveness. (CFR 4.2)

Recommendation: Create a robust IR function that will plan, organize, collect, analyze, and disseminate assessment and other institutional information.

2. Institutional Learning and Improvement (CFRs 4.3 – 4.7)

All levels of the campus community seem engaged with the core issue of educational effectiveness, and this is an important and transformative evolution in RSC’s culture. The team’s interviews with the academic leadership team and faculty reinforced the self-study’s assertion that all member of the campus community are committed to ongoing improvement of teaching and learning and to other elements of RSC’s educational and outreach efforts.

However, while RSC has made plans for assessment of the campus environment, assessment of teaching and student learning has been delayed; and what has been done is uneven. In part because of the changes taking place as RSC deals with its financial issues, and despite the strategic plan having been updated to include the next 18 months, conversations with board members and the president made clear that institutional planning and a number of assessment plans have been put aside until the fundamental issues of RSC's survival and financial health are resolved. Although there is a growing understanding of the need to create a program of inquiry, further action will be needed to ensure evidence-collection and evaluation that leads to improved effectiveness in both the curricular and co-curricular arenas. (CFR 4.3.)

This concern for RSC's progress in developing a focused, institutionally-centered culture of evidence as the basis for improving teaching and learning is by no means meant to suggest that the faculty and academic leadership of RSC are not aware of, or are disengaged from, questions of student learning and educational effectiveness. The team found a faculty that is actively focusing on educational effectiveness as a group, using the weekly meetings of the Academic Senate as a forum for focused discussion and examination of best practices in teaching and learning and for consideration of emerging trends in the world of higher education. One significant result of these interactions has been the collaborative development of a set of program and institutional learning objectives and of a preliminary program review protocol.

However, at the time of the team's campus visit, although the team had the chance to cursorily review a draft program review report for the MA, there was not time for RSC to take any action as a result of that the program review report, which had not yet been distributed to faculty. While the faculty and academic leadership team take philosophical responsibility for educational effectiveness and student success, RSC has not yet constructed a functional,

regularly scheduled infrastructure or set of processes to ensure consistent and meaningful examination of teaching, learning, and student success. Nor is the campus ready to make use of any findings to improve its curriculum, pedagogy, or assessment program (CFR 4.4.)

While the campus has undertaken nascent efforts to develop evidence-based processes to ensure that there are established, common performance standards for students, conditions that support student success, and structures and policies that facilitate educational effectiveness, RSC will need to reflect on the procedures and structures that will provide the institution with meaningful and useful evidence for improvement. One important activity for RSC is to carry out the marginally implemented program review protocol. (CFRs 4.4, 4.6.)

Recommendation: Develop and refine the program review protocol and perform a comprehensive program review of both academic and co-curricular programs that includes sufficient data and analysis to provide meaningful feedback for institutional improvement.

In addition to the campus community's increasing engagement with issues of improvement and educational effectiveness, RSC has a history of community outreach programming and has also sought formal and informal feedback from a variety of stakeholders, such as alumni, practitioners, and students. The extent to which these interested parties are engaged in the actual assessment and evaluation of RSC's educational enterprise is unclear and appears underdeveloped. (CFR 4.5.)

More significant, perhaps, in light of the challenges and upheavals the college has faced recently, are RSC's efforts to offer occasions for institutional reflection and planning to stakeholders such as the board, faculty, staff, and community members. RSC prepared a comprehensive planning document in 2011, for the period from 2011 to 2014, centered in a

process of “appreciative inquiry.” That document described three strategic priorities, but the college did not operationalize them. While meetings were held with faculty and staff in 2012 and 2013 to discuss the goals and to consider implementation strategies, and while the board explored possible options, the financial challenges that RSC faced seem to have crushed any effort to implement an effective plan.

In the face of the changes to RSC’s structure and organization, the leadership of RSC created a short-term (18-month) interim planning document as a preliminary roadmap for a larger, more comprehensive and inclusive strategic planning. That document reviews the 2011-2014 goals, identifies major short-term goals, and establishes both a timeline and measures for a more complete planning process, which would address the period from 2015-2018. (CFR 4.6.)

As RSC’s financial issues are addressed and new structures begin to solidify, actions can be taken to position RSC more effectively in the changing environment of K-12 education and Waldorf teacher preparation. The leadership team, board, and faculty of RSC have a clear and accurate sense of the potential for a scaling up of Waldorf educational practices in the public school sector. Charter school growth has the potential to increase demand for Waldorf-trained teachers and principals. The development of the Common Core and the need for state-based teacher credentialing will require RSC to develop new training and a revised curriculum of professional development courses, workshops, and conferences.

Similarly, while RSC offers online and distance modalities for its students, the potential in this arena of education is one that RSC plans to explore and expand. RSC has begun to gather information about Department of Education regulations about alternative modalities; and RSC appears eager to take up both the challenges and opportunities that online and distance education

offer. Somewhat connected to distance and online education, RSC also is interested in investigating how it might enlarge its international and global footprint, an initiative which is rooted both in the Waldorf philosophy and in the expanding ecology of American higher education.

While no specific plans, programs, or resource needs have been identified, RSC clearly is considering how to best position itself for future success and growth. Along these same lines, RSC's planned collaboration with Meristem will offer RSC, its students, and its faculty new opportunities for research and program development related to the needs of children with autism spectrum diagnoses. RSC has identified the need for teachers to provide new kinds of educational support for these students and is beginning to consider how best to meet this demand. (CFR 4.7.)

SECTION III – COMMENDATIONS AND RECOMMENDATIONS

A. Commendations

1. RSC's new president demonstrates extensive capability, vision and energy.
2. RSC's new leadership team exhibits capable crisis management and commitment of time and skills to stabilize the college and move to ensure institutional health.
3. RSC exhibited a high level of openness and appears to take the accreditation review process with seriousness.
4. RSC exposes its master's degree students to a range of philosophical and methodological approaches relevant for contemporary studies of education and develops their capacities for research that can contribute to broad and advanced scholarship, as well as to a high level of professional practice.

5. RSC fosters its students' success and well-being through both formal and informal, curricular and co-curricular means of support.
6. RSC's faculty demonstrates enthusiasm for professional development in a variety of forms as an aspect of the organizational culture.
7. RSC's faculty and staff have maintained high morale, which is particularly impressive given all the recent changes.
8. RSC's students demonstrate energy, dedication, passion, and enthusiasm, all of which embody the RSC mission.

B. Recommendations

The team recommends that RSC:

1. Make all necessary changes to ensure institutional autonomy and comply with the WSCUC Independent Governing Boards Policy. (CFRs 1.5, 3.9)
2. Become a financially sustainable institution and operate without annual deficits through 2016 and beyond. (CFR 3.4)
3. Ensure that the academic development of RSC is given significant and sufficient weight relative to its business and financial concerns, recognizing that institutions of higher education have unique needs and operational best practices. (CFR 1.5)
4. Provide the president with the authority and management responsibilities appropriate for the CEO of an institution of higher education. (CFR 3.6, 3.7, 3.8)
5. Transition the governing board's role toward assuming a fiduciary and strategic, rather than an operational, role. (CFR 3.9)
6. Standardize credit unit assignments and both implement and publicize SLOs at the institution, program, and course levels, recognizing that other planned curricular reforms and

improved assessment measures depend upon changes in these areas. (CFRs 2.2, 2.3, 2.4, 2.6, 2.7)

7. Provide sufficient library resources, including appropriate space, staff, and collections. (CFRs 2.13, 3.5)
8. Create a robust institutional research function that will plan, organize, collect, analyze, and disseminate assessment and other institutional information. (CFR 4.2)
9. Develop and refine the program review protocol and perform a comprehensive program review of both academic and co-curricular programs that includes sufficient data and analysis to provide meaningful feedback for institutional improvement. (CFRs 4.4, 4.6)
10. Ensure that RSC administrative leadership and staff actively participate in relevant higher education associations and organizations to learn about and benefit from sound strategies and proven practices for colleges and universities. (CFR 3.3)
11. Take steps to preserve RSC's access to sufficient and appropriate space for its educational and operational needs. (CFR 3.5)

APPENDICES

CREDIT HOUR AND PROGRAM LENGTH REVIEW

Material Reviewed	Questions/Comments (Please enter findings and recommendations in the Comments sections as appropriate.)
Policy on credit hour Catalog Section 6	Is this policy easily accessible? x YES <input type="checkbox"/> NO
	Where is the policy located? Course catalog
	Comments:
Process(es)/ periodic review of credit hour (SECTION8)_RSC- Policy-068_Credit- Hour.pdf	Does the institution have a procedure for periodic review of credit hour assignments to ensure that they are accurate and reliable (for example, through program review, new course approval process, periodic audits)? x YES <input type="checkbox"/> NO
	Does the institution adhere to this procedure? x YES <input type="checkbox"/> NO
	Comments:
Schedule of on-ground courses showing when they meet	Does this schedule show that on-ground courses meet for the prescribed number of hours? x YES <input type="checkbox"/> NO
	Comments:
Sample syllabi or equivalent for online and hybrid courses	How many syllabi were reviewed? 1
	What kind of courses (online or hybrid or both)? hybrid
	What degree level(s)? master's
	What discipline(s)? Education
	Does this material show that students are doing the equivalent amount of work to the prescribed hours to warrant the credit awarded? x YES <input type="checkbox"/> NO
	Comments:
Sample syllabi or equivalent for other kinds of courses that do not meet for the prescribed hours (e.g., internships, labs, clinical, independent study, accelerated)	How many syllabi were reviewed? 1
	What kinds of courses? practicum
	What degree level(s)? master's
	What discipline(s)? Education
	Does this material show that students are doing the equivalent amount of work to the prescribed hours to warrant the credit awarded? x YES <input type="checkbox"/> NO
	Comments:
Sample program information (catalog, website, or other program materials)	How many programs were reviewed? 1
	What kinds of programs were reviewed? degree
	What degree level(s)? master's
	What discipline(s)? education
	Does this material show that the programs offered at the institution are of a generally acceptable length? x YES <input type="checkbox"/> NO
	Comments: 48 unit master's degree requirement

Review Completed by: Lu Rehling

Date: March 5, 2015

STUDENT COMPLAINTS REVIEW

Material Reviewed	Questions/Comments (Enter findings and recommendations in the Comments sections of this table as appropriate.)
Policy on student complaints	Does the institution have a policy or formal procedure for student complaints? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
	Is the policy or procedure easily accessible? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
	Where? It is located in a section of the student handbook
Process(es)/ procedure	Does the institution have a procedure for addressing student complaints? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
	Please describe briefly: Any student who experiences an unsatisfactory interaction with RSC personnel, or RSC faculty, may file a grievance form to be sent to the president or member of the leadership team. Depending on the level of the grievance, a grievance committee will investigate and determine the appropriate disposition
	Does the institution adhere to this procedure? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
Records	Comments:
	Does the institution maintain records of student complaints? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO Where? The records are maintained in the President's grievance files (in case of grievances other than students) and dean of students in the case of student grievances.
	Does the institution have an effective way of tracking and monitoring student complaints over time? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO Please describe briefly: Yes, the president and dean of students Complaint Log available for review.
Comments:	

Review Completed by: Barbara Karlin

Date: March 5, 2015

MARKETING AND RECRUITMENT REVIEW

Material Reviewed	Questions and Comments: (Enter findings and recommendations in the Comments sections of this table as appropriate.)
**Federal Requirements Recruiting and Enrollment Documentation is found in the Additional PDF Documents Folder Code of Ethics	Does the institution follow federal requirements on recruiting students? X YES <input type="checkbox"/> NO Unknown Comments:
	Does the institution provide information about the typical length of time to degree? YES Source: www.rudolfsteinercollege.edu (under admissions and program information – Does the institution provide information about the overall cost of the degree? Yes Source: www.rudolfsteinercollege.edu (under admissions and program information) Comments: A potential student has to select from 16 attachments to identify the tuition and fees for the right attachment. Once found, the forms do provide the overall cost of the degree.
Careers and employment	Does the institution provide information about the kinds of jobs for which its graduates are qualified, as applicable? YES Does the institution provide information about the employment of its graduates, as applicable? Yes
	Comments: There is no straight-forward way to locate the discussion regarding job information. However the information is available on the web if one knows where it is located. It is contained in the BPPE annual report at http://www.rudolfsteinercollege.edu/BPPE-annual-report

**Section 487 (a)(20) of the Higher Education Act (HEA) prohibits Title IV eligible institutions from providing incentive compensation to employees or third party entities for their success in securing student enrollments. Incentive compensation includes commissions, bonus payments, merit salary adjustments, and promotion decisions based solely on success in enrolling students. These requirements do not apply to the recruitment of international students residing in foreign countries who are not eligible to receive Federal financial aid.

Review Completed by: Barbara Karlin

Date: March 5, 2015

TRANSFER CREDIT REVIEW

Material Reviewed	Questions/Comments (Please enter findings and recommendations in the comment section of this column as appropriate.)	Verified Yes/No
Transfer Credit Policy(s) http://rudolfsteinercollege.edu/policies	Does the institution have a policy or formal procedure for receiving transfer credit?	yes
	Is the policy publically available? If so, where?	yes
	Does the policy(s) include a statement of the criteria established by the institution regarding the transfer of credit earned at another institution of higher education?	yes
	Comments:	

*§602.24(e): Transfer of credit policies. The accrediting agency must confirm, as part of its review for renewal of accreditation, that the institution has transfer of credit policies that

- (1) Are publicly disclosed in accordance with 668.43(a)(11); and
- (2) Include a statement of the criteria established by the institution regarding the transfer of credit earned at another institution of higher education.

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

Review Completed By: Lu Rehling

Date: March 5, 2015