

**REPORT OF THE WSCUC TEAM
SPECIAL VISIT**

To Academy of Art University

March 21st · 2024 - March 22, 2024

Team Roster

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The team evaluated the institution under the **2013** Handbook and Standards of Accreditation and prepared this report containing its collective evaluation for consideration and action by the institution and by the WASC Senior College and University Commission (WSCUC). The formal action concerning the institution's status is taken by the Commission and is described in a letter from the Commission to the institution. This report and the Commission letter are made available to the public by publication on the WSCUC website.

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SECTION I – OVERVIEW AND CONTEXT

Description of Institution, Accreditation History, and Visit

Description of the Institution

The Academy of Art University (AAU), a private, for-profit institution, is situated in San Francisco, California. It offers a variety of academic credentials, including associate, bachelor's, and master's degrees, alongside 13 non-degree certificates across 24 fields of study. Disciplines include fine arts, illustration, industrial design, architecture, game design, fashion design, jewelry and metal arts, as well as film and television. The institution boasts 50 associates, 67 bachelor's, and 99 master's degree programs. Established in 1929 by Richard and Clara Stephens as The Academy of Advertising Art, AAU has been under the leadership of Elisa Stephens, the founders' granddaughter, since 1992 and operates under the ownership of the Stephens Institute.

AAU's mission focuses on equipping aspiring professionals in design, communication, and the arts with robust undergraduate and graduate educational offerings and portfolio development programs. The university emphasizes practical experience, hiring seasoned professionals as instructors, and attracting working artists as faculty members. Although AAU began offering online education options in 2002, the COVID-19 pandemic necessitated a shift to exclusively remote education, generally involving 102 asynchronous programs and 127 on-site programs.

The university has maintained a significant role in San Francisco's community for over 90 years, contributing significantly through its diverse and international student body, faculty, and staff. The institution continues to uphold an inclusive admission policy at the undergraduate level, reflecting its commitment to providing equal educational opportunities in the arts. This policy supports a student body of varied artistic and academic abilities, highlighting AAU's longstanding dedication to education accessibility for diverse populations.

Accreditation History

Although AAU was granted candidacy by the WASC Commission in 1982, it was denied initial accreditation in 1989. AAU persisted and was granted initial accreditation in 2007 for a period of seven years. A scheduled interim report was accepted in the Spring of 2010. Accreditation was reaffirmed in June 2014 with a Formal Notice of Concern requiring a Special Visit in fall 2016.

The Commission acted to receive the special visit team report and continue the Formal Notice of Concern through spring 2018 and scheduled a Special Visit in spring 2018 to assess progress. The 2018 Special Visit explored the following issues:

Issue 1: Institutional decision making, transparency responsibilities and communication

Issue 2: Faculty model, Governance roles and responsibilities

Issue 3: Institutional research and evidence-based decision making for continuous improvement

Issue 4: Strategic planning and data driven changes.

Recommendations that resulted from the Special Visit were that AAU continue their positive momentum in the areas of:

1. Collaborative and institute-wide efforts with data-informed and evidenced-based decision making.
2. Supporting and encouraging the growth of AAU's emerging faculty governance structure in which decision-making authority is clearly defined and academic leadership is exercised
3. Promoting transparency and collaboration within the university around decision-making processes

Following the 2018 Special Visit, the Commission acted to receive the Special Visit team report, remove the Formal Notice of Concern, continue with the reaffirmation review with the Offsite Review in Fall 2020 and the Accreditation Visit in Spring 2021, and schedule a Progress Report to be submitted by March 1, 2019 to address a) Decision-making processes b) Shared governance c) Strategic planning.

A virtual Reaffirmation of Accreditation visit took place in April of 2021 due to the COVID pandemic. As a result of that visit, the team recommended a special visit in 2024 to address the following issues:

Issue 1: New Strategic Plan

Issue 2: New LMS

Issue 3: Evaluation Systems

Issue 4: Graduation Rates

The institution was also asked by WSCUC Vice President Christopher Oberg to add an additional fifth issue, “student complaints” to their special visit after WSCUC received three separate complaints from a former student (now alum). This report reflects the team’s observations of these issues based on AAU’s report and the special visit from March 21, 2024-March 22, 2024.

Description of Team’s Review Process

Prior to the site visit, the team conducted a video conference on February 6th, 2024 to review areas of responsibility for the team. The team read AAU’s Special Visit Institutional Report, reviewed the appendices, and developed questions and requests for additional documents prior to the special visit. AAU was responsive to the team’s requests. During the special visit, the team met with administration, students, faculty and staff to inquire about the 5 issues of interest.

Institution’s Special Report: Quality and Rigor of the Report and Supporting Evidence

The team found that the report was well organized and clearly written around the Standards. The report was reflective of the components that captured AAU-identified important issues for each of the four Standards addressed. Areas of strength and improvement demonstrated AAU’s progress on data driven and collaborative assessment of core competencies and learning outcomes, student services effectiveness and outreach to increase persistence, and responsiveness to the COVID-19 pandemic. AAU demonstrated a wide-spread effort to grasp and respond to the direction of the Commission’s previous recommendations.

AAU provided attachments that were relevant and detailed. During the visit the team requested additional materials to have the most current and accurate information possible. Additional material requests included examples of instruments used in performance reviews for employees and detailed strategic planning documents and detailed strategic planning documents. The Self-Study Report accurately describes the state of the university. Faculty were included in the discussion of issues. The data and evidence support claims made by AAU. AAU's self-review led to a greater understanding of its effectiveness, practices, and student learning.

SECTION II – EVALUATION OF ISSUES UNDER THE STANDARDS

Issue 1: New Strategic Plan

Implement a strategic planning process to include a fully developed marketing and enrollment plan, an academic master plan, an infrastructure to build alignment to the budget process, and opportunities for involvement of the wider university community. (CFR 4.6)

Subsequent to the WSCUC reaffirmation in June 2021, AAU undertook a nearly 10-month process to develop a strategic plan which covers the years 2022 through 2027. A wide consultative process appears to have been followed so that all stakeholders – enrolled students, faculty and staff, alumni, and members of the Board of Directors – could contribute. The planning process began with the administration of a survey to these stakeholders. As focus areas emerged, Area Leads developed draft worksheets outlining goals and objectives, with feedback requested from the various constituent groups. Initial drafts of the resulting plan were then shared with several committees, culminating in rewrites and an eventual final version approved by the President and Strategic Planning Committee (after further input from the Board) in February 2022.

Consistent with CFR 1.1, AAU's vision and mission stand at the top of the hierarchical representation of the strategic plan, under which are nested the four focus areas: Institutional Effectiveness; Students and Faculty; Organization, and Finance and Regulatory Compliance. The plan articulates specific goals and strategies associated with each focus area. However, a budget for full implementation is not included as part of the plan.

AAU has developed several means to review progress in implementing the strategic plan and, where necessary, updating and revising goals. An annual review was conducted in Spring 2023 and provided sample worksheets completed by area leads during that review (Appendix 1.15). AAU also provided tracking sheets completed on a quarterly basis (Appendix 1.12).

Two campus-wide initiatives derived from the strategic plan are the transition to a new online learning management system and the adoption of a 120-credit BFA degree (in lieu of the original 132-credit degree) for newly enrolled undergraduate students. These initiatives demonstrate AAU's capacity to design, budget, pilot, and implement aspects of its strategic plan.

AAU's annual budget process aims to align finances with the focus areas of the strategic plan. Significant expense was incurred for the adoption of the new Brightspace LMS. However, the document that was provided to the visiting team (Department Examples Budget Preparation and Strategic Planning) is a retrospective alignment of budgetary and equipment requests with numbered elements of the strategic plan tracking sheet. It is not clear how the initial formulation of the strategic plan and regular review of accomplishments establish budget priorities. Document 1.20 Strategic Budgetary Narrative Samples contains descriptions and narratives from two Academy units – Campus Safety and Compliance – regarding their budget requests. Even here, it is unclear what specific budget requests and allocations were made in relationship to the narrative descriptions. In concert with its development of the strategic plan, AAU produced an Academic Master Plan, Strategic Admissions Plan, and Strategic Marketing Plan. All three were developed and approved in spring 2022.

The Academic Master Plan (AMP) delineates goals, objectives, and strategies regarding the curriculum, faculty, and student learning. For example, in the area of curriculum, the AMP notes the following critical success factors: the identification of new industry-relevant programs and short courses; the implementation of the 120-unit BFA; and improved systems for students to access upper division courses to complete their degrees. For faculty, engagement of instructors in institutional decision-making, especially around curriculum, is one articulated success factor to be achieved. Others include offering of

faculty development opportunities, onboarding of new faculty with attention to institutional values and culture and supporting faculty in the use of the Brightspace LMS for both online and onsite instruction. Although achievement of some of the critical success factors is described in the self-study report (e.g., the reduction of total credit units for the BFA degree) and appear subject to regular review, no documents were submitted that show how the AMP is being implemented and what progress has been made with each success factor. The Strategic Admissions Plan and Strategic Marketing Plan are companion documents that aim to ameliorate enrollment losses from the COVID period, stabilize enrollment trends, and eventually surpass total enrollment of 8,400 students.

It was clear from the visiting team's interviews that AAU employs a highly professional and dedicated staff who are working to improve post-COVID enrollment through both admissions and retention efforts (see the discussion below on CFR 2.10 for further information about enrollment management and graduation rates). What is less certain is the grounding of the Strategic Admissions Plan in institutional data. Enrollment targets are presented in the document as percentage increases. Surpassing a total enrollment count of 8,400 students by fall 2024 is projected to entail increases in the international student population (2% year-over-year), high school seniors (2.5%), overall undergraduate admissions (3.4%) and graduate admissions (1%). Although it may be known by staff, the plan itself does not indicate the baseline (which could be fall 2022 or fall 2023) upon which this growth is predicated, making it difficult for the site visitors to review progress.

Like the strategic plan itself, the three additional plans do not contain an initial comprehensive budget forecast. Instead, managers include funding requests and rationales as part of each year's budget proposals. There is no doubt that AAU is prepared to fund the strategic plan and its subsidiary academic, enrollment, and marketing plans. Evidence for this comes from the adoption of the new learning management system and the hiring of new staff to improve one-year retention of undergraduate students. Nonetheless, the visiting team is left with the impression that the institution is not working with a comprehensive funding plan but rather is selecting items on a year-by-year basis.

To conclude, the visiting team notes the significant work undertaken by AAU to develop a strategic plan, including academic, admissions, and marketing plans. A broad consultative process was employed to generate these documents. Several elements of the plan have been implemented. A shortcoming is that AAU did not cost out the strategic plan at the outset and instead relies on the annual budgeting process to decide which elements are to be implemented.

Issue 2: New LMS

During the WSCUC accreditation reaffirmation visit in the spring of 2021, AAU described its intention to adopt a new Learning Management System (LMS) in its institutional report. This shift was motivated by the realization that AAU's online program had surpassed the capabilities of its bespoke LMS. Faculty members expressed the need for more versatility and control in managing their courses, aiming for a system that could be more readily adapted to meet the varied needs of different student groups. Academy leaders encouraged faculty input on the potential benefits of switching to a new LMS. A dedicated LMS transition team evaluated several commercial platforms against the capabilities of AAU original LMS. Through extensive research, the team narrowed the options to Canvas and Brightspace. Following thorough consultations with faculty and staff in 2019, and considering student feedback, Brightspace by Desire2Learn was selected as the new LMS platform.

Configuration of Brightspace began in January of 2020 under the direction of a program manager to oversee the LMS transition and coordinate the efforts of the academic departments with the technical teams in Online Education Services as well as with the Information Technology and Curriculum Systems and Support departments. With the support of the LMS transition governance team, the program manager led a core working group of faculty and staff to manage the LMS transition. For three years, the core group oversaw the transition from the custom LMS into Brightspace and the adoption of additional application. At the site visit, the team received a demonstration of the new LMS, spoke with the LMS transition team, full and part-time faculty, and students to gain insight how the transition to the new platform was being experienced by AAU's community both academically and operationally.

The majority of students and faculty who the team spoke to commended the LMS transition team for their willingness to receive feedback and implement change during the transition. For example, the transition team expected that some students and faculty would miss the “old LMS”, which was a custom proprietary system built from the ground up by AAU to support arts education. The implementation team designed a careful gap analysis to better understand which tools and functions would not be available out-of-the-box in Brightspace. Plans were made to remediate those losses by researching solutions to replace these tools once the legacy LMS was phased out. One such tool was an assessment “Mark up” tool that allowed faculty to provide annotated feedback to students on art images and other visuals. After significant feedback from the faculty on their needs, the LMS team designed and built a new solution to be integrated with Brightspace which carried many of the same capabilities of the original legacy tool. While a few part-time faculty did express a desire for the original tool, the team received a demonstration of the new tool during its visit and was satisfied that AAU did as much as they could to incorporate community feedback to design a new solution (CFR 3.5).

Another primary component to the implementation of the new LMS was training for faculty and students (CFR 3.3). The Online Education Services (OES) special projects team was charged with providing training for AAU. The team developed and created three instructional programs that navigate users through the specifics of Brightspace's layout, the administration of courses, the processes involved in creating course materials, and the methods used for grading in the gradebook, among other topics. This team facilitated conversations within these programs and was on hand to address inquiries. Furthermore, they hosted interactive Q&A training sessions via Zoom to further assist participants. The special projects team also wrote and built the Tutorials section of the User Home. Users have access to more than 200 resource pages, covering topics such as: where to find, download, and install Adobe Creative Cloud; how to add images to topic threads; how to record a video comment into the class discussion, among others. During the site visit the site visit team spoke with both full and part-time faculty and all had been exposed to the training and part-time faculty were paid for their training (albeit they reported it was far less than what they

receive for instruction). The team also had the opportunity to navigate the tutorial section of the User Home page and found the resources within the site very comprehensive. Students also received significant training and resources with access to help desk, live and asynchronous job aids, academic support resources, and readiness training for all new students (CFR 2.13).

Finally, AAU did significant work to ensure that programmatic assessment was embedded within the curriculum structure of the new LMS (CFR 4.1). Lead by their director of assessment and piloted first within the college of Liberal Arts, the assessment team began building clickable rubrics, using the Brightspace rubric tool. Liberal Arts faculty worked closely with the assessment director to improve on this assessment process over the first three semesters of using Brightspace and is now being used to assess all program learning outcomes. This option is now being offered to all other academic programs.

Issue 3: Evaluation Systems

The Commission Action Letter asked AAU to “Implement evaluation systems for faculty, staff, and executive leaders: Develop a formal process for employee performance evaluation including full-time & part-time faculty & senior leadership” (CFRs 2.9 & 4.3). AAU notes that this recommendation resulted from the visiting team’s observation that, “while the president was evaluated by the board of directors annually, the evaluation of faculty and staff was less structured or formalized.”

In response to the Commission’s recommendation, AAU decided to deploy the existing Workday human resources software to launch formal evaluations; the project became a part of the Strategic Plan 2022-2027 which was finalized in Winter 2022. The actual work began in fall 2021 with a Workday consultant who assisted in developing strategies and a timeline for a new evaluation system for faculty and staff. Feedback was gathered from faculty and the Academic Steering Committee. After the system was in place (Summer 2022), consensus-building meetings were held with faculty and academic leaders before the actual launch in September 2022.

Given the size of the part-time faculty, AAU selected them as the first group to undergo the evaluation process. The institutional report outlines the structure of the evaluation process, which includes 9

performance standards that both the part-time faculty and their managers assess and assign a rating on a 1-4 scale. This is all conducted in Workday. The HR team provided a training video for faculty to review prior to completing their self-evaluations and made themselves available to answer questions and provide support throughout the launch. AAU's institutional report indicates that 88% of the eligible group had completed their evaluations, and interviews with leadership indicate that the remaining evaluations are underway.

During the special visit, the review team met with the AAU Evaluation Team and other constituents. While the Evaluation Team's responses seemed consistent with the institutional report, feedback from other employees, particularly part-time and full-time faculty, offered a somewhat more nuanced perspective. During the special visit, some part-time faculty reported that there had not been sufficient training prior to the start of the evaluations and a lack of understanding as to how evaluation results would be used (e.g., for performance bonuses or salary increases). In contrast, the results of a survey administered by AAU to faculty and directors after the roll-out of the new evaluation system indicate an overall positive sense of the experience (Appendices 1.31, 1.32). Qualitative feedback solicited by the survey included an expressed desire for there to have been an option to provide explanations or comments on the Workday form, a sentiment expressed by a few of the faculty that the visiting team encountered.

While the institution has implemented an evaluation process for part-time faculty, the next phase is an evaluation process for the full-time faculty, administrative staff, and executive leaders. The Evaluation Team shared that full-time faculty evaluations were underway at the time of the visit and the staff process would begin in Summer 2024. The President has submitted her self-evaluation to the Board but there was no mention of when other executive leaders would be subject to periodic formal review.

It appears that AAU has made significant progress in initiating the development of a culture of employee evaluation. At the same time, tangible progress has been limited to the implementation of an evaluation protocol for one employee group (part-time faculty). Questions also remain about the role of evaluations in decisions surrounding compensation and appointment status, and the timing of repeated evaluations going forward.

To conclude, the visiting team notes the significant work undertaken by AAU to develop an evaluation system that, with appropriate modifications to the criteria, can be used for all employees. An inclusive process was employed in the initial development of the Workday solution, though it appears only one category has been fully evaluated in three years since the WSCUC recommendation. The administration of a post-evaluation survey to part-time faculty and directors indicates that the Academic is developing a culture of continuous improvement. An area for AAU to work on would be clarification regarding the use of evaluations in personnel decisions and the cycle of future evaluations. Finally, the team makes the following recommendation to AAU: Implement with greater urgency and transparency the formal evaluation process across all levels of the university. (CFRs 4.3, 3.9)

Issue 4: Student Complaints:

In December 2021 and May 2022 WSCUC received three separate complaints from the same student (now alum). WSCUC invited AAU to examine how it could have addressed these complaints more effectively. AAU conducted a review of its policies and procedures and made changes to better respond to student complaints. WSCUC closed the complaints following a review of the changes made by AAU.

The team explored the changes made to responding in a timely manner to student complaints and in particular to discrepancies in grading. The AAU Grievance Committee clarified that the three complaints received were from a single student. The complaint arose from conflicting technology during the transition to Brightspace LMS. AAU has since transitioned fully to the Brightspace LMS where all courses now inherit the same grade schemes and grade scales. AAU now has a single grading policy for online and onsite classes. Further, a gradebook is set up in Brightspace to ensure grade discrepancies will not occur again.

The Grievance Committee reported that it conducts an annual review to monitor recommendations and address identified issues. The Committee reviewed and revised its grievance policy and procedures to ensure fairness and due process, as well as put in place mechanisms for resolving complaints in a timely manner. This policy is accessible to all constituents and is found in the Catalog and on AAU's website. The

Grievance Committee confirmed that student complaints are now acknowledged within 24 hours of receipt. The complaint is addressed and resolved within two weeks or one month if more time is needed. The Committee informs the student when additional time is needed to prepare an official response due to factors such as the submission of additional evidence. (CFR 1.4)

Issue 5: Graduation Rates

Analyze disaggregated student achievement data to identify and implement processes and support to improve graduation rates. (CFR 2.10)

AAU's institutional report for the special visit notes that, at the time of its reaffirmation visit in 2021, the six-year graduation rate for full-time, first-term students was 45%, a slight yet positive increase from 40% in 2019 and 38% in 2018. The data covered bachelor's, associate's, and certificate entrants. These data prompted the Commission to ask AAU to attend to and improve graduation rates and disaggregate data in future reports. AAU has taken several steps to improve retention and graduation rates, though the alignment of planning with the disaggregated data is not fully apparent in all situations.

IPEDS data for 2022 show six-year rates of 45% and 43% for bachelor's seeking students who entered, respectively, in fall 2014 and 2016; the 8-year rate for the former group rises to 48%. These numbers stand out favorably against those of a comparison group of 18 private for-profit institutions whose median 150% graduate rate is calculated at 25% for the fall 2014 entering cohort.

AAU acknowledges that its graduation data do not compare as well when examined against the Key Indicators Dashboard published by WSCUC. For the latter data set, the national six-year graduation rate for 2022 is 52% and among WSCUC institutions is 63%. However, AAU contends that the IPEDS benchmark set consists of similarly placed for-profit institutions with an open admissions or similar mission (i.e., an "inclusive admissions policy").

One key variable – online versus on-campus status – also does not appear to have been used for disaggregation purposes, though such data were presented to the visiting team upon request. This variable

may be worth further consideration by AAU given that 53% of undergraduates in the 12-month period beginning fall 2019 were exclusively enrolled in distance education as defined by IPEDS and 23% were exclusively on campus. Based on the additional data received, the team notes that graduation rates for campus and online students for the 2015, 2016, and 2017 cohorts (both AA and BFA students, transfer and first-time enrollees) differ by an average of 35 percentage points in favor of the former.

AAU administered a survey to non-retained students and distinguished the results between the online and onsite populations. (Appendix 1.08) Insufficient financial assistance and changes in students' financial circumstances were the top reasons for both online (26%) and onsite (24%) cohorts to discontinue their studies. In contrast, a few differences did distinguish the motivations for leaving the institution among the two groups. For example, the academic environment, including instruction and curriculum, motivated 45% of online and 52% of onsite students to cease their studies. Parallel to this finding, 42% of online and 52% of onsite students believed they had not received adequate support to be successful in their programs.

Retention rates for first-time bachelor's students vary by enrollment status. Whereas 70% of full-time students returned in fall 2022 after completing one academic year, only 40% of part-timers did so. Full-time transfer students who entered in fall 2014 graduated at a rate of 47%, whereas only 8% of part-timers did so. The data clearly show a need for heightened attention to part-time students.

There are many ways to examine institutional data and enrollment planning is certainly a work-in-progress. AAU demonstrates a commitment to improving both retention and graduation rates. It has organized several committees, task forces, and new staff positions to address this concern. Several actions have been undertaken to improve both early retention and timely graduation. These include:

- the merger of financial aid and student accounts functions, which is said to have reduced the number of student complaints and financial blocks for registration.

- the adoption of a degree planning platform that assists both students and advisors in charting a multi-semester path toward successful degree completion by ensuring alignment of program requirements and course scheduling.
- a coaching program that assigns a staff member to serve as a guide to students in navigating classes, assignments, administrative offices, technology, and the like.
- the reduction of the number of course credits required for completing both the associate's and bachelor's degrees, which is intended to mirror academic requirements at comparable institutions and provide a more feasible path for degree completion.

The visiting team recognizes the steps taken by AAU to improve student achievement and that investments in new staffing patterns, activities, and software have been made. The team also recognizes that the fruits of these actions may take some time to be seen. At the same, AAU is encouraged to tie its planning more to its own outcomes data. For example, the new coaching program could be a valuable means to ensure entering students' acclimation to the institution. However, with a one-year retention rate of 70% for full-time undergraduates, it is not clear how AAU determined coaching as a focal point of its retention efforts. The visiting team was also left wondering why the new standards for associate's and bachelor's degrees were not implemented immediately, and instead will cover students who enter under the fall 2023 or fall 2024 catalog. It will take significant time for AAU to benefit from the modification of academic requirements. Finally, a question emerged about the tracking of associate's and bachelor's students given a recent effort to encourage BFA students at risk of not completing their degrees to instead earn an AA en route. This is a reasonable approach to assisting students, especially if an associate degree might enable them to find employment in the field and then resume their studies. However, it was unclear how the data will be organized to account for students who did not originally enroll at the associate's level yet receive that degree.

A number of actions have recently been taken to improve student success, including the hiring of additional staff to provide coaching services, the use of an online app for program planning, and reducing the number of required credits to attain an undergraduate degree. These actions were taken so recently that the team was unable to see any data on the results or implementation of such actions. The use of disaggregated data to inform retention and degree completions decisions is not completely addressed in the institutional report. The team makes the following recommendations for improvement in the use of data for student success – Establish a consistent and uniform approach to track and analyze student success data disaggregated by relevant demographic categories and degree levels (CFR2.10). Develop a plan to improve retention and graduation rates that is informed by the student success data and is aligned with the strategic plan (CFRs 2.10 and 4.6)

SECTION III – OTHER TOPICS, AS APPROPRIATE

Not Applicable

SECTION IV – FINDINGS, COMMENDATIONS, AND RECOMMENDATIONS

It was clear to the team that the Academy of Art University conducted an informative and productive internal review. The team recognizes the work that the institution put into the report and in responding to the team's requests for additional documents. As a result of this review, the team has come to understand AAU's mission, leadership, faculty, staff and students.

COMMENDATIONS

The team commends The Academy of Art in particular for the following:

1. The inclusive process used to develop and inform the strategic plan.
2. The changes made to improve timely responsiveness to student grievances.

RECOMMENDATIONS

The team recommends that The Academy of Art University:

1. Implement with greater urgency and transparency the formal evaluation process across all levels of the university. (CFRs 4.3, 3.9)
2. Establish a consistent and uniform approach to track and analyze student success data disaggregated by relevant demographic categories and degree levels (CFR2.10)
3. Develop a plan to improve retention and graduation rates that is informed by the student success data and is aligned with the strategic plan (CFRs 2.10 and 4.6)