

# **REPORT OF THE WSCUC TEAM**

For Reaffirmation of Accreditation

To Keck Graduate Institute of Applied Life Sciences

February 18-20, 2026

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The team evaluated the institution under the 2023 Standards of Accreditation and prepared this report containing its collective evaluation for consideration and action by the institution and by the WASC Senior College and University Commission (WSCUC). The formal action concerning the institution's status is taken by the Commission and is described in a letter from the Commission to the institution. This report and the Commission letter are made available to the public by publication on the WSCUC website.

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## **Section I – Overview and Context**

### **A. Description of Institution and Accreditation History**

Located in Claremont, California, approximately 40 miles east of Los Angeles, Keck Graduate Institute (KGI) was founded in 1997. KGI is the seventh and newest member of the Claremont Colleges, dedicated to innovative education in healthcare and life sciences. The Claremont Colleges consortium provides KGI students with a writing center, library, bookstore, campus safety, student disability resource center, TimelyCare, Empower Center, Chicano Latino Student Affairs, Office of Black Student Affairs, Queer Resource Center, Religious and Spiritual Life, and Title IX based on the list of support services available to students provided by KGI via the consortium 2025/26 document.

KGI was created to connect science and application through industry-connected graduate education. It started with a single academic program, the Master of Business and Science (MBS), formerly known as the Master of Bioscience, and has grown into a specialized graduate institution offering 15 degree programs and eight certificate programs across multiple disciplines in the applied sciences and health professions. As of 2026 Spring, KGI enrolls 572 students, with 89 faculty members (54 full-time and 34 part-time) and 70 full-time staff.

The Riggs School of Applied Sciences (Riggs) houses the flagship MBS program, recognized as a national model for professional science master's programs. Riggs offers seven master's degree programs, a PhD in Applied Sciences, and seven certificates. It emphasizes preparing graduates for leadership roles in biotechnology, pharmaceuticals, medical devices, and related industries.

#### **Master's Degrees:**

1. Master of Biotechnology Management (Distance Education)

2. Master of Community Health Administration (Distance Education)
3. Master of Engineering in Biopharmaceutical Engineering (On-site)
4. Master of Science in Applied Life Sciences (On-site)
5. Master of Science in Human Genetics and Genomic Data Analytics (On-site)
6. Master of Business and Science (On-site)
7. Master of Science in Medical Device Engineering (On-site)

Certificates:

1. Biocon Academy, Certificate in Biosciences (Distance Education)
2. Certificate in Applied Genomics (Distance Education)
3. Certificate in Bioscience Management (On-site and Distance Education)
4. Certificate in Healthcare Economics (Distance Education)
5. Certificate in Leadership (Distance Education)
6. Post-baccalaureate Pre-Physician Assistant Certificate (On-site)
7. Post-baccalaureate Pre-medicine Certificate (On-site)

The Biocon Academy Certificates in Biosciences and Clinical development (Exhibit KGI 4.D) are offered at a distance to students admitted to the Biocon Academy and have the largest enrollment, with 30 of 47 total students. The Biocon Academy, based in India, is a post-baccalaureate training program that prepares students for India's biotech industry.

The School of Pharmacy (SOP) offers the Doctor of Pharmacy (PharmD) program, accredited by the Accreditation Council for Pharmacy Education (ACPE). The program integrates scientific foundation, clinical training, and interprofessional education to prepare graduates for contemporary pharmacy practice.

The School of Health Sciences offers a Doctorate in Occupational Therapy, a Master of Science in Human Genetics and Genetic Counseling, and a Master of Science in Physician Associate Studies. All three degree programs are programmatically accredited by the Accreditation Council for Occupational Therapy (ACOTE), the Accreditation Council for

Genetic Counseling (ACGC), and the Accreditation Review Commission on Education for Physician Assistants (ARC-PA).

KGI emphasizes diversity and inclusion within its student body and reports representation levels that exceed national STEM averages, based on KGI student demographic trends and the 2023 Diversity and STEM Women, Minorities, and Persons with Disabilities report from the National Center for Science and Engineering Statistics.

KGI received its initial accreditation from the WASC Senior College and University Commission (WSCUC) in 2004. Accreditation was reaffirmed in 2011 and again in 2018 for eight years, with an Interim Report in 2020. Since 2020, substantive change requests have been made for six-degree programs and implemented.

## **B. Description of Team's Review Process**

The review team has five members who completed an Off-Site Review (OSR) on September 3-4, 2025. In preparation for the OSR, the team members reviewed the institutional report, the compliance worksheet to the standards, federal compliance forms, and supporting documentation provided by the institution. The compliance worksheet was completed prior to the OSR.

Based on the OSR, the team identified key lines of inquiry and requested additional materials to support further analysis and evaluation. Supplementary documentation was provided both before and during the site visit.

In accordance with the reaffirmation process, a confidential email account was established to enable the KGI community to comment and provide input. Two responses were received, and the team reviewed and discussed them.

During the site visit, the team conducted interviews and discussions to verify the consistency of the institutional report and supporting evidence. Meetings were held with representatives of the KGI board of trustees, senior administration, faculty, staff, and students. Information gathered through document review, additional materials, and interviews informed the team's analysis and conclusion regarding institutional effectiveness and compliance with the standards.

### **C. Institution's Reaffirmation Report and Update: Quality and Rigor of the Report and Supporting Evidence**

The institutional report was well organized and generally reflected the institution's current stage of development. During the WSCUC Steering Committee meeting, the team confirmed that committee membership was broadly representative of the campus community, including senior leadership, student services, academic leadership, and the Faculty Assembly Chair.

The Steering Committee shared that their work began with a review of the WSCUC standards and the prior accreditation report and its recommendations. The Faculty Assembly Chair participated in all key meetings related to the institutional report, and the Faculty Assembly served as the primary forum for broad faculty engagement. Through the Faculty Assembly, surveys and discussions were conducted in which faculty reviewed progress with faculty governance since the last accreditation, analyzed key issues, and provided recommendations. In response to the governance recommendation, the faculty led a comprehensive rewrite of the Faculty Handbook approved by the board of trustees on October 23, 2024.

Participants characterized the self-review process as open, collaborative, and increasingly evidence-informed. The self-review also surfaced areas requiring further institutional development, including the consolidation of policies, procedures, and standard operating practices, improved documentation of assessment processes, and stronger long-term financial planning. These themes were consistent with the institution's stated goal of advancing institutional maturity.

## **Section II – Evaluation of Institutional Report**

### **Subsection A: Response to Previous Commission Actions**

In 2018, the Commission recommended KGI to report on progress in the following areas:

1. Manage growth by integrating planning across functional areas, including finance, facilities, technology, and staff and faculty levels, and by basing decisions not primarily on their impact on cash but also on the extent to which they generate surpluses from operations. (CFRs 3.4, 3.5, 3.7)
2. Develop and execute a plan to significantly reduce debt incurred to finance operational growth to improve debt capacity for future capital growth. (CFR 3.4)
3. Continue the productive dialogue about transparency, shared governance, research support, and faculty expectations for research, teaching, and service in personnel reviews. Ensuring the faculty has an influential voice in the leadership of the institution will evidence progress. (CFRs 2.8, 3.2, 3.10)

### *Manage growth by Integrating Planning Across Functional Areas*

A clear focus on evidence-based financial planning and operational performance was recommended by the team that visited KGI in 2018. In the interim report submitted by KGI in 2020, the institution described the budgeting process and noted that the approach was holistic and transparent. During the onsite visit, it was evident that there was a dedicated attempt to have a transparent budget process, with increased visibility into monthly financial reports and a clear line-of-sight budgeting plan across the organization. This expanded approach was just recently implemented with the change in leadership for the organization.

One example of an integrated planning process discussed in almost every meeting during the onsite visit was the strategic plan. The planning process included a number of stakeholders across the organization, including the board of trustees. The community felt heard during this process and, in return, supported the strategic plan.

While KGI has made considerable progress in integrated planning, as exemplified by the budget and strategic planning process, the institution has not made sufficient progress on this recommendation. As discussed in the team report below, the institution has just initiated a process to develop a deferred maintenance plan, a facilities master plan, and an IT strategic roadmap. Integrating these plans with a yet-to-be-developed hiring plan and assuring all are aligned with the strategic plan will be essential for realistic financial forecasting and debt planning.

### *Develop and Execute a Plan to Significantly Reduce Debt*

The institution has not made progress in meeting this recommendation. In the 2020 Interim Report, KGI presented debt forecasts through FY25 and stated they plan to reduce debt by 23% from FY16 to FY25. In reality, debt increased by 10% over the FY16 level by FY25 and debt is forecast to be 17% above FY16 by the end of this fiscal year (FY26). KGI stated in the interim report that debt would be utilized for asset/investment purchase or revenue-generating initiatives, such as new programs. While a planned new medical school was cancelled, thereby reducing anticipated debt, operational expenses over the past two fiscal years and the current fiscal year are in a deficit, backfilled by a line of credit. It should be noted that the Board of Trustees is carefully monitoring the institution's financial situation and considers deficit spending necessary to build a strong future for the institution.

### *Continue the Productive Dialogue about Transparency, Shared Governance*

Based on interviews during the visit, the team found KGI has made progress in responding to the recommendation to continue dialogue regarding transparency, shared governance, research support, and faculty expectations. Leadership has strengthened communication through regular faculty and staff meetings, leadership updates, and standing meetings between the president, provost, and faculty representatives, improving opportunities for two-way dialogue.

Shared governance structures have been strengthened. The Faculty Assembly and Faculty Forum provide formal channels for faculty input. Faculty have participated in key initiatives, including revisions to the Faculty Handbook and the development of the Strategic Plan 2035. The Faculty Assembly is represented at the Board of Trustees during academic

affairs meetings and faculty participate in Trustee dinners and presentations. These efforts have clarified governance roles, expanded faculty participation in institutional planning and strengthened faculty and trustee communications.

The revised Faculty Handbook provides clearer expectations for teaching, scholarship, and service, supported by evaluation rubrics and more standardized annual review processes. Seed grants and professional development opportunities have also been introduced to support faculty research and scholarly activity. Collectively, these efforts demonstrate meaningful progress by KGI toward the recommendation.

## **Subsection B: Institutional Essays**

### **Standard 1 – Defining Institutional Mission and Acting with Integrity**

#### **Institutional Purposes**

Keck Graduate Institute (KGI) has clearly defined its mission, values, culture, and the ways they contribute to the public good. (CFR 1.1)

KGI was founded in 1997 by Dr. Henry Riggs with significant support from the W.M. Keck Foundation. His vision was to serve the public good through scientific education focused on entrepreneurship and professional training to advance the application of science in the world. Its mission remained true to Rigg’s vision and has evolved slightly over the past 30 years to be:

“We are driven by passion and guided by curiosity to forge new pathways in biotechnology and healthcare through distinctive hands-on education and translational research. With a culture rooted in inclusive excellence and interdisciplinary collaboration,

we develop leaders who transform discovery and innovation into real-world solutions that create lasting impact within our communities and beyond.”

KGI core values include:

- **Innovation and Transformation:** Integrate cutting-edge research, interdisciplinary inquiry, and entrepreneurial thinking to challenge conventional thought and drive change in the biotechnology and healthcare industries.
- **Ethics and Leadership:** Emphasize and guide effective solutions that are socially responsible and prioritize the well-being of people and communities.
- **Creativity and Curiosity:** Encourage bold questions, challenge conventional wisdom, promote critical thinking, and explore the advancement of new technologies, solutions, and approaches.
- **Connection and Community:** Develop lasting relationships, foster belonging, encourage interdisciplinary collaboration, and engage all people, thoughts, and ideas.

KGI has a defined set of goals, policies, and practices that uphold its purpose and character. (CFR 1.2) For example, active learning, industry and clinical partnerships, and research are defined as core educational practices. The integration of active learning across all courses is fostered through faculty training and development resources and reinforced through the course and instructor evaluation process. An experiential education component, long a part of a KGI education, is required in every KGI degree program, regardless of its modality. It has defined institutional, program, and course learning outcomes. Student success, as defined by graduation rates and graduate outcomes, is strong and promoted by a close relationship between students with faculty and staff across academic and student support areas.

## **Integrity and Transparency**

The board of trustees and the president were clear that their goal is to shift KGI from operating in “start-up mode” to a more stable, financially sustainable institution. These goals are clearly reflected by the four priorities in their new Strategic Plan 2035: Advance Academic Excellence, Enhance the Student Experience, Accelerate Institutional Maturity, and Elevate the KGI Brand. Significant progress is already underway, including extensive organizational and operational changes to better support its academic programs and improve operational efficiencies. For example, KGI moved from a two to a three academic school structure, unified under the Office of the Provost, allowing academic affairs to move toward a shared service model for faculty development, research, academic data, and assessment support. A new Faculty Handbook was developed, bringing much-needed clarity to faculty roles, workload, and promotion standards. Academic programs have been revised to increase student enrollment and program-based revenues. Programs are being reviewed for fiscal viability and curricular efficiency, resulting in low-demand degree programs being sunset while new programs are being introduced, all aligned with KGI’s mission.

The team observed during the site visit that faculty and staff groups expressed great appreciation for the level of transparency, strong communication practices, and integrity that characterize KGI’s culture. (CFRs 1.3, 1.7)

Information regarding academic resources, financial services, campus life, health and wellness, and IT services is accessible on the website. Online asynchronous distance courses also highlight services for distance students in their syllabi.

Updating and consolidating operating policies and business procedures has been a major initiative over the past few years as KGI transitions to a more mature institution. Faculty have expressed appreciation for the enhanced clarity in academic policies now easily accessible in the revised Faculty Handbook. As administrative practices are undergoing change, such as in admissions and marketing, revised standard operating policies and practices are being developed and consolidated. Given the importance of this effort, the team recommends that KGI continue its progress in establishing administrative operating policies and business procedures. (CFR 1.4)

Operating policies and procedures are undergoing extensive changes at KGI as discussed above. Even so, based on responses to questions to students, faculty, and staff, the institution operates with integrity, new policies and procedures are applied equitably, and the institution responds fairly and in a timely manner to complaints or grievances. (CFRs 1.4, 1.5). In addition, faculty, students and program directors confirm that the institution adheres to its published policy on academic freedom in the Faculty Handbook. (CFR 1.6)

The team appreciated the honest and open communications with all representatives of KGI and that the institution takes the accreditation review process seriously. (CFR 1.8)

## **Standard 2: Achieving Educational Objectives Through Core Functions**

### **Degree Programs**

Degree programs are well defined in content, objectives, and requirements. Professional competencies are appropriate, as are the breadth and depth of programs. Entry requirements are present for all programs and are clearly stated on the KGI websites. Learning outcomes exist at the course, program, and institutional levels. Four programs (PharmD, Doctorate in Occupational

Therapy, Master of Science in Human Genetics and Genetic Counseling, and a Master of Science in Physician Associate Studies) hold programmatic accreditations and are in good standing with their respective accreditors. (CFRs 2.1, 2.2)

The institution clearly identifies and effectively implements student learning outcomes and achievement expectations. Faculty-developed rubrics are used for both summative and formative assessments and are shared with students as performance expectations. These outcomes and expectations are reflected in and supported by academic programs, policies, and curricula. The outcomes provide the framework for academic advising, student support programs and services, and information and technology resources, as demonstrated by program descriptions and requirements and academic advising webpage(s) of the courses and programs. (CFR 2.3)

KGI uses two primary processes to assess program effectiveness: an annual program review and a comprehensive seven-year program review cycle. The annual review provides a snapshot of program performance, including evaluation of program learning outcomes, while the seven-year review offers a more in-depth assessment of program quality and effectiveness. (CFRs 2.4, 4.1)

Assessment leadership indicated that programs with specialized accreditation follow the evaluation requirements established by their accrediting bodies, while other programs follow KGI's institutional assessment process. The team observed that this structure creates challenges in aligning program-level assessment with institutional learning outcomes (ILOs). Programmatic accreditors typically evaluate program effectiveness using discipline-specific standards rather than program learning outcomes that map directly to institutional outcomes. As a result, there is

currently a gap in systematically rolling up assessment results from the PLO level to the ILO level in the annual assessment process. (CFRs 2.4, 4.1)

Program review cycles vary depending on specialized accreditors' requirements and may occur at intervals ranging from a few years to seven years. The assessment leadership team, in collaboration with program faculty and deans, coordinates these cycles to reduce redundancy and better align the annual assessment process, the institutional seven-year program review cycle, and programmatic accreditation reviews. (CFR 2.4)

KGI has developed a template for its internal program review self-study. Programs with specialized accreditation follow the self-study format required by their respective accrediting bodies and provide supplemental information when institutional review elements are not included in the programmatic self-study. (CFR 2.4)

The team reviewed four program reviews: the Doctor of Pharmacy program (2024), the Master of Business and Science program (2023), the PhD in Applied Life Sciences program (2021), and the MS in Human Genetics and Genetic Counseling program (2021). The reviews were thorough and included evidence of program effectiveness, areas for improvement, and timelines for implementing changes. For example, the Master of Business and Science program revised its curriculum through the program review process, reducing the required credits from 60 to 48 to remain competitive with similar programs. (CFR 2.4)

However, discussions with assessment and academic leadership indicated that documentation of assessment results, resulting actions, and follow-up evaluation is uneven across programs. While many programs assess outcomes and implement improvements, documentation does not consistently demonstrate how assessment findings inform decisions or

how subsequent evaluation occurs. In addition, the timing of annual reports, internal program reviews, and programmatic accreditation self-studies does not always align, leading to duplication of effort.

While the institution has established multiple processes to assess program effectiveness, greater consistency in documentation and stronger alignment across assessment and review cycles would enhance the systematic use of assessment results to improve programs. The team recommends that KGI develop and formalize a documented approach to aligning program review and assessment processes to ensure that assessment results, including analysis of student achievement of program learning outcomes, are systematically used for program improvement. (CFR 2.4)

## **Faculty**

The team observed that KGI has qualified, dedicated faculty with the credentials, capacity, and commitment to design, deliver, and continuously improve academic programs that support student learning and success. Four academic programs hold programmatic accreditation with specialized standards related to faculty qualifications. Academic leadership confirmed during the visit that all programs remain in good standing with their respective programmatic accreditors. (CFRs 2.5, 2.6)

The team found that faculty play a central role in curriculum design, the development and assessment of course and program learning outcomes, and the evaluation of student performance. Faculty establish standards for student achievement and ensure that academic programs align KGI mission. Each of the three schools maintains a faculty-led curriculum committee that reviews proposed curriculum changes before forwarding them to school leadership and then to

the Office of the Provost. Committee membership typically includes program directors and faculty within the school, with assessment or institutional research staff participating when relevant data are reviewed. (CFRs 2.6, 2.7)

Faculty exercise effective academic leadership in maintaining the quality of academic programs. During interviews, faculty and academic leadership consistently noted that programs maintain ownership of their program learning outcomes (PLOs) and course learning outcomes (CLOs). Faculty design and revise these outcomes and map them to institutional learning outcomes (ILOs), while assessment and institutional research staff provide analytical support. For example, faculty described reviewing the institutional learning outcome related to ethics and recognizing that, although ethical considerations were embedded in the curriculum, they were not always explicitly reflected in course outcomes or capstone rubrics. This review prompted revisions to better align learning outcomes and assessment practices. (CFRs 2.6, 2.7)

Faculty Assembly representatives are elected within each school, and the Faculty Assembly meets formally four times per year, with additional meetings convened as needed. A Faculty Forum is held once per semester to provide broader opportunities for faculty discussion and input. During the visit, the team learned that progress has been made in clarifying expectations for faculty workload and in standardizing the dossier used for faculty promotion across the institution. Interviewees also noted improvements in communication processes under the current president and provost, as well as continued efforts to strengthen shared governance, particularly through faculty participation in the development of Strategic Plan 2035. Faculty expressed interest in increased participation in budget discussions, including those related to departmental and program budgets. In addition, the institution has initiated a 360-degree

evaluation process for senior administrators, beginning with the provost and expanding to other members of the senior leadership team. (CFR 2.8)

## **Student Learning and Performance**

The institution demonstrates that graduates achieve the stated learning outcomes, as evidenced by assessments of student performance and results from the Spring 2025 student exit survey. Expectations for student achievement are also reinforced through the standards of the four programmatic accreditors: ACOTE, ACPE, ACGC, and ARC-PA. (CFRs 2.9, 2.10)

In addition, course evaluation instruments currently vary across schools. Academic leadership indicated that a common course evaluation questionnaire, including a measure of teaching effectiveness, will be implemented beginning at the end of the Spring 2026 semester to allow for more consistent evaluation across programs. Continued development of documentation and processes to support the assessment of teaching effectiveness and the systematic use of these data will further strengthen institutional assessment and program improvement efforts. (CFR 2.5)

Student performance in on-time graduation is strong, with longitudinal data showing rates averaging 92–93% for the Fall 2019–2021 entering cohorts. (CFR 2.10)

The team observed that systematic collection of alumni feedback has been limited. Historically, alumni surveys have been administered at the program level during the seven-year program review cycle. KGI reported plans to implement its first institution-wide alumni survey during the 2026–2027 academic year to provide more consistent feedback from graduates and strengthen institutional assessment processes. (CFR 2.11)

Career Services administers a first-destination survey to collect employment outcomes data through several methods, including an online survey distributed via the Handshake platform,

LinkedIn searches, and updates from program directors. Employment outcomes were reported for the 2023 and 2024 graduating classes. For the three programs with the largest number of graduates in 2024, reported employment rates were 77% for the PharmD program, 98% for the MS in Applied Life Sciences program, and 71% for the MS in Community Medicine program. (CFR 2.11)

The team noted during the visit that the institution initially tracked employment outcomes for five programs and has since expanded its efforts to include 18 programs, indicating progress in strengthening post-graduation outcomes monitoring. The team recommends that KGI continue expanding systematic tracking of students' outcomes following graduation across all programs and use the results to inform program improvement. (CFR 2.11)

## **Student Support**

The team observed that academic advising and student support services are well established. Each student is assigned two advisors: one connected to the student's academic program and another based on faculty availability and student interests. This two-advisor model applies to both on-ground and distance education students, and students are required to meet with an advisor at least once each semester to monitor progress. Student services also provide wellness and career support. Co-curricular engagement is supported through 38 active student clubs and organizations, including eight new clubs established in 2026. In addition, onboarding processes have transitioned to an online format, improving accessibility for all students, including those enrolled in distance education programs. (CFRs 2.12, 2.13)

The team also observed examples of the institution responding to student feedback to improve campus services. For example, in response to student government concerns regarding

food access and cost, the institution arranged weekly food trucks on campus. The food pantry was also relocated from a locked room to an open, self-service space after access barriers were identified, accompanied by additional communication efforts to increase student awareness.

(CFR 2.14)

During meetings with Student Affairs, the team learned that learning outcomes for clubs and student organizations have not yet been formally defined or assessed. The current data collection primarily focuses on participation counts rather than learning outcomes. Student affairs leadership acknowledged this as an area for continued development. The team recommends that KGI develop and formalize a documented, institution-wide assessment process for student support and co-curricular services to ensure that results are systematically analyzed and used for improvement. (CFR 2.14)

### **Standard 3 – Assuring Resources and Organizational Structures**

#### **Faculty, Staff, and Administrators**

KGI is benefiting from an enthusiastic set of highly qualified faculty, staff and leaders working hard to shape a sustainable future for the institution. The new president and the leadership team engage in transparent decision-making and effective communications while enhancing administrative support for the faculty and staff to meet the institution's educational, student support, and administrative goals. KGI benefits from a Board of Trustees with a range of applicable background, knowledge and skills that provides effective oversight and engagement in strategic, policy, performance and fiscal matters.

The institution demonstrated that the faculty, staff and administrators are sufficient for the current makeup of programs that are in place (KGI Student to Faculty Ratio Fall 2024 and Fall 2025). A salary benchmarking study was recently conducted by KGI, which reviewed all faculty and staff to compare salaries to competitors and the market. KGI leadership shared its goal to have everyone at least at the 50<sup>th</sup> percentile for their position. Employees who are currently below the 50th percentile will be increased over time, subject to the operating budget. (CFR 3.1)

With the goal of aligning academic offerings with student demand, academic programs conducted a mini-review of all programs as part of the president's listening-and-learning tour. During the review, three programs (Master of Science in Regulatory Affairs, Master of Science in Translation Medicine, and Master of Science in Community Medicine) began the sunseting process and will be closed once all currently enrolled students have completed the program. During the visit, the team noted that, due to the sharing of faculty between degrees, most faculty were retained, even as the program was being discontinued. KGI's finance team discussed the process used to bring on new programs, evaluating not only financial aspects but also external factors, including demand for degree programs and employment opportunities after graduation. (CFR 3.11)

The human resource process has been expanded to include a much more robust onboarding and orientation process. Human Resources (HR) meets with faculty and staff, reviews a substantial amount of information for the organization, and provides PowerPoint slides with all the helpful links. HR provides hiring managers with feedback on how new employees are settling into the department. During an open staff meeting, employees spoke positively about the onboarding process and complimented the institution on their practices. Shared with the team

during the visit that HR is working with a consultant on an employee engagement survey that is targeted for the beginning of April, with the plan to conduct the survey every two to three years. (CFR 3.2)

Professional development opportunities are available for faculty and staff. KGI provided a list of professional development opportunities offered to its employees. Staff mentioned the leadership's openness to allowing employees to pursue professional development opportunities in their specific fields. A number of examples were given that helped employees further career through professional development. Staff members were given opportunities to pursue professional development outside KGI that helped them advance in their careers and added value to KGI. There is also room for employees to advance within the organization. One staff member discussed how they have moved into three different roles within the organization, each time advancing their career. (CFR 3.3)

KGI noted that, as a cost-saving measure, the president and the president's cabinet have assessed each open position to determine the need and the optimal timing to fill it. An example that was given was delaying the hiring of the dean of the School of Health Sciences, which resulted in annual savings of roughly \$300K. As the strategic plan 2035 advances, it will be essential that the institution projects and assesses additional positions needed and includes this information in financial projections. The team recommends that the institution create and implement a hiring plan aligned with its strategic plan to ensure that its educational objectives are met. (CFR 3.1)

## **Financial, Physical, Technology, and Information Resources**

KGI presented some evidence that its budget and resource allocation planning and processing support its objectives. It was evident from meetings with KGI employees that the budgeting process is collaborative. Input is requested and received from staff members in all departments. Budget managers receive monthly actual vs budget reports, along with real-time reports in the Workday system. Budget managers receive training from the finance department in interpreting reports. Furthermore, at the quarterly all-faculty and staff meetings, the institution's updated financial position is presented to everyone. The campus conveyed that they know where the institution stands financially, based on interviews during the visit. (CFR 3.11)

In the institutional report, KGI stated that they have been focused on implementing critical reforms to advance fiscal sustainability and organizational maturity, ensuring a more sustainable academic enterprise. This was evident throughout the institutional report and during the site visit. The institution acknowledged current external risk factors, most notably the recruitment of international students, the historically inflated enrollment projections vs. actuals, and the need to diversify revenue streams. KGI is focused on process-based efficiency and savings, diversifying revenue streams, and reducing expenses.

KGI provides financial resources to support high-quality academic offerings, student support, and is expanding business operational capacity in marketing, admissions, and philanthropy. However, this spending has led to a significant financial deficit in their annual operations for three years: FY2024: -\$1.56M; FY2025: -\$2.79M; FY2026: - \$4.14M (projected).

KGI has relied on a line of credit to backfill their operations thus far, but they intend to draw on their endowment once debt interest rates exceed the endowment's investment returns.

Cash flow is a challenge and is monitored closely by the CFO, president, and the board of trustees' finance committee. According to the trustees, they consider this spending essential for transitioning KGI from a “start-up” mode to a sustainable enterprise and expect the deficit spending to end by FY28.

In the updated document that the team received in December 2025, it was projected that the operations will be positive in FY28 (Five-Year Financial Forecast). Total revenue is projected to exceed \$50M by FY30, while expenses only grow to \$43.8M. The main driver of this positive bottom line is increased enrollment and externally funded revenue.

Exhibit 3.35 – Net Asset Forecast FY26-FY30 shows a projected increase of \$6.3M by FY30. The institution has demonstrated endowment growth and a focus on cost savings measures from FY18 to FY25. However, the positive Net Asset Forecast assumes significant growth in enrollments, philanthropy, and other external funds, which may not be realistic.

The team is concerned that KGI's budget forecasting has a history of being overly optimistic. For example, in the 2020 interim report, the financial overview projected that KGI, after a year of breakeven in FY21, would be profitable up to \$7M by FY25. This did not occur. A significant reason for the unrealistic projection was the overly optimistic forecasting of enrollment revenue and external funding. These overstated and unrealistic financial projections do not serve the governing board and the institution well. Realistic projections for enrollment, along with manageable expectations for fundraising, will help better align the institution's expectations moving forward. Note that in the last two years, the institution has made a dedicated effort to provide more realistic enrollment projections by engaging a breadth of leaders with an external view: marketing, admissions, philanthropy, and academics. With tuition revenue

the institution's main driver, realistic, attainable enrollment goals and projections will be imperative for KGI.

Within the institutional report, KGI stated the following were new priorities for philanthropy: CRM enhancement, board engagement, planned giving, major donor identification, academic alignment, digital philanthropy, and campaign planning. Philanthropy and fundraising projections are included in the institution's financial forecast. The overall externally funded revenue is projected to increase from \$6.6M in FY26 to \$13.1M to FY30. This large increase is a major driver of the projected surplus starting in FY28. KGI will need to monitor fundraising actuals and update projections as necessary to avoid inflating future projections. Distinguishing between donations received, documented pledges and aspirational fund-raising is essential for realistic budgeting forecasts and cash flow projections. (CFR 3.5)

Given the rapid changes in external factors, including international student access to the US, reductions in grant funding, and uncertainty about donor gifts, KGI's financial projections will need to be updated on an ongoing basis to adjust for a range of possible changes in the institution's landscape. By having multiple budget scenarios based on conservative enrollment and fundraising projections, if revenue falls short of goals, this will trigger expense reductions in preplanned areas. This will reduce volatility at the institution.

Based on the materials reviewed and interviews, the team recommends that, to help provide more realistic budgeting, it is necessary for KGI to develop five-year financial projections based on different enrollment levels; develop budget scenarios based on different projected enrollment outcomes; and create a multiyear capital expenditure plan and assess how this will affect overall debt projections and cash flow. (CFRs 3.4, 3.5)

The institution's most recent debt forecast (Dec 2025) states that the current \$40M debt will decrease to \$32M by the end of FY30. In the past, the institution's line of credit was only used to fund new academic programs, but over the last two years the line of credit has been utilized to support operations. KGI stated that the line of credit was used because the locked-in interest rate was favorable compared to the return the endowment was receiving. The Vortex property sale is projected to be completed in FY28, with a projected net revenue of \$8M. The KGI finance team stated that \$5M would be allocated to reducing overall debt.

Based on the Cash Flow Forecast Summary, annually available cash has decreased from \$7.4M in FY20 to \$2.76M in FY25. The forecasted amounts of available cash were substantially higher than actuals. In a meeting with the president and CFO, it was discussed that cash flow is being monitored and projections are adjusted weekly and the board noted concerns with cash flow at the institution. The board has approved a portion of the endowment's unrestricted amount to be used, if needed, to maintain needed cash flow.

Cash flow planning and debt reduction are areas that will require additional focus as the institution moves forward.

KGI is undergoing multiple efforts to reduce spending and improve business operational efficiency. Examples include:

- KGI hired an assistant vice president and legal counsel in July 2025 to provide in-house legal support. With the creation of this role, the institution saved roughly \$500K per year. The institution was utilizing multiple outside attorneys without a centralized approach, resulting in an excessive amount of expenses. This new position was described as a generalist overseeing several legal areas for the organization, including contract review.

- KGI hired a new IT director in March 2025, and the main focus has been to streamline platforms, reduce costs, and enhance cybersecurity. To support these initiatives, KGI has implemented a centralized procurement model for purchasing software and technology needs, which was not in place previously. By combining all three schools on one platform, they achieved \$30K savings.

During the meeting with the IT director, an IT strategic roadmap was discussed.

Examples of projects within the roadmap included network refresh, A/V refresh, and mobile credentials. Data security remains a major focus of the institution. As the institution increases the number of distance education learners, the team suggests that KGI review IT support availability to meet students', faculty's, and staff's needs, especially after hours.

In a meeting with the finance department, it was noted that a facilities master plan was not currently in place for the institution. KGI is in the process of reviewing deferred maintenance and long-term planning. Currently, deferred maintenance is not included in the long-term debt plan and cash flow projections. The team recommends that KGI develop a comprehensive facilities master plan along with a deferred maintenance schedule and document the impact on debt, operations, and cash flow to inform future resource allocations. (CFR 3.6)

### **Organizational Structures and Decision – Making Processes**

KGI has an independent board with appropriate authority that evaluates itself annually. The board has 16 members, of whom one is the president, and 15 are independent, based on the KGI trustee roster as of December 1, 2025. The board recruits and hires the president. The governing board also evaluates the president annually and provides feedback on cabinet members for the president's review of the team. (CFR 3.7)

The Board of Trustees brings a breadth of backgrounds, knowledge and skills that help them carry out the responsibilities of the board. There are varying terms for trustees, and the board recently added its first alumnus of the institution. Trustees are extremely dedicated to the institution's overall success and are willing to help where needed. It was stated that all board members are invited to attend the finance committee, even if they are not voting members. Furthermore, all board members are included on the academic affairs committee. Faculty members and leadership are included in the board dinners, allowing trustees to interact with staff and faculty. (CFR 3.8)

Board members are included in all major decision-making and changes within the organization. The board members noted that information was shared regularly with the board and there were no surprises. During the strategic planning process, two board members served on the strategic planning committee. These board members did not drive the conversation but offered support and guidance to the overall process. In addition, the governing board discussed the hiring of the new leadership with the organization. The governing board was very direct about the direction it wanted to see the organization move toward, and it felt confident that, with the current leadership in place, the institution would be set for sustainability moving forward. The governing board was candid about the institution's challenges and the need to recruit more domestic students from coast to coast. With lower enrollment among foreign students, the governing board stated it was imperative to expand brand recognition domestically, including advancing and marketing efforts. Discussions with the chair of the board and the chair of the finance committee demonstrated the close attention trustees pay to KGI finances. It would benefit the board and the institution if trustees and senior leadership work with the Association

of Governing Boards (or a similar organization) to identify key financial ratios and best practices in financial forecasting to enhance long-term financial planning at KGI. (CFR 3.7)

Based on the Interim Report and meetings with senior leadership, faculty and staff, it is evident that the institution has sufficient and qualified leadership capacity at all levels, characterized by integrity, appropriate responsibility, high performance, and accountability. To augment the president's cabinet, KGI has implemented a university leadership council. It was stated in several meetings that when decisions are made or major changes are proposed for the organization, a collaborative approach is used. Feedback is received not only from the president's cabinet and the university leadership council, but also from faculty and staff. (CFR 3.9, 3.11)

The institution demonstrated that data is collected across the institution. Departments are collecting data, but there was a gap in how the data was used and shared across the institution. Multiple platforms/systems are being used among the departments. IT has established a centralized approach to software procurement, reducing software duplication and additional costs for the organization. To utilize data effectively across the organization, the team recommends that the institution develop an institution-wide data governance framework that supports systematic tracking, analysis, and dissemination of data, ensuring that evidence is consistently applied in institutional decision-making. (CFRs 3.6, 3.10)

#### **Standard 4 - Creating an Institution Committed to Quality Assurance and Improvement**

##### **Quality Assurance Processes**

KGI demonstrates a genuine and thoughtful commitment to quality assurance and continuous improvement. The institutional report documents the process for assessing program learning outcomes and conducting program reviews. Although further documentation of the

process is needed, KGI's program review cycle and the alignment with external accreditation timelines show an intentional approach to quality assurance. (CFR 4.1)

The Office of Academic Effectiveness (ACE) provides comprehensive institutional data, including enrollment trends, graduation rates, exit survey results, and IPEDS data submission. ACE shares program-level performance data to support informed decision-making. (CFR 4.1)

Data are disaggregated by program and by gender and race/ethnicity, depending on the analysis. At the same time, the IR team ensures that individual student identities are protected and will not disaggregate information if the number of students is small enough to potentially identify them. (CFR 4.2)

The institution also administers a campus climate survey to assess overall satisfaction and better understand the campus environment using the Higher Education Data Sharing Consortium (HEDS) tool. Although the survey was initially scheduled for a two-year cycle, institutional leadership determined that additional time was necessary to implement improvement initiatives and assess their effectiveness. Accordingly, the survey will be conducted every 3 years to enable meaningful analysis of progress and impact. (CFR 4.3)

The team reviewed the evidence provided in the institutional report and confirmed during the site visit that KGI has engaged in student support services. KGI lacked a systematic process to assess the effectiveness of student support services and co-curricular activities. The team recommends that KGI develop and formalize a documented, institution-wide assessment process for student support and co-curricular services. This process should ensure that assessment results are systematically analyzed and used for continuous improvement, including evaluating students' achievement of program learning outcomes and integrating those findings into the program review process. (CFR 4.3)

Further, the institution's research capacity, scope, and coordination have improved compared to prior years, particularly due to the creation of the institutional research position. However, there is still a recognized need for standardized data capture from admission through registration and for system integration. Currently, key platforms, such as the Student Information System (SIS) and Salesforce, do not integrate seamlessly, leading to inefficiencies in reporting and data management. (CFR 4.4)

### **Institutional Improvement**

KGI demonstrates improvement grounded in inquiry, evidence, and evaluation (CFR 4.5). For example, the PharmD program conducted a review of assessment data after identifying that the certification exam pass rate was approximately 10 percentage points below the national average. In 2024, the first-time pass rate was 63.8 percent, underscoring the need for focused intervention. Faculty convened to analyze the findings, examined course evaluations and related evidence, and developed a formal proposal to their school's curriculum committee to address the gap. As a result of this review process, the course sequence was revised to better support student success. The impact of these evidence-based changes led to a first-time pass rate of 86.1 percent in 2025, exceeding the national average of 84.9 percent for that year, according to the North American Pharmacist Licensure Examination Pass Rates for 2023-2025 graduates. These results demonstrate the effectiveness of the program, along with faculty involvement, and how they engage in continuous inquiry into the process of teaching and learning by systematically reviewing program-level data and incorporating reflective discussion to ensure that the program standards of performance are being achieved of using assessment data to drive improvement. (CFR 4.6)

KGI maintains a comprehensive, multi-level evaluation structure to support institutional effectiveness. The governance board conducts self-evaluations annually. In addition, the president's cabinet has begun to implement a 360-degree evaluation process beginning in spring 2026, starting with the provost. Faculty and staff performance are evaluated annually in accordance with the institutional policies. Together, these practices demonstrate the institution's commitment to ongoing evaluation across governance, leadership, and personnel. (CFR 4.7)

At KGI, the institution has done an impressive and commendable job of engaging stakeholders in its planning and decision-making process. Broad-based input has been intentionally sought and incorporated by faculty, staff, students, and other members of the community. Most notable is the development and implementation of the Strategic Plan 2035. From its creation through execution, the process has provided meaningful opportunities for participation through committees. KGI's collaborative structure is commendable and reflects a strong culture of shared governance and instructional engagement. (CFR 4.8)

### **Subsection C: Reflections - Synthesis of Insights as a Result of the Reaffirmation Process**

Overall, the institutional report and the interviews conducted during the visit presented conclusions that were generally focused, evidence-informed, and grounded in analysis of institutional practices and outcomes. The team observed a clear understanding of KGI's mission-driven identity, the strengths of its academic programs, and the institutional changes underway as KGI transitions from a start-up phase toward greater organizational maturity.

The institution reflected an emerging culture of evidence and inquiry that informs institutional decision-making and planning. The institution demonstrated how assessment results, program reviews, and stakeholder input contribute to improvements in curriculum, student

support services, and institutional planning initiatives for Strategic Plan 2035. Examples such as the use of assessment data to improve program outcomes and the broad engagement of stakeholders in strategic planning illustrate how the institution is using evidence to inform practice and guide future development.

At the same time, KGI acknowledged areas where processes and systems continue to evolve as the institution advances toward greater operational maturity. The institution has undertaken a significant effort to develop and consolidate standard operating procedures and institutional policies to strengthen administrative clarity, consistency, and accountability across units. These efforts, along with improvements in governance communication and shared decision-making, reflect a deliberate approach to building stronger institutional infrastructure.

KGI and its board recognized ongoing financial challenges associated with recent operational investments and enrollment variability. While the institution has implemented measures to improve fiscal sustainability, including more realistic enrollment projections, expanded stakeholder engagement in budgeting, and strategic investments in enrollment management and marketing, financial projections remain dependent on enrollment growth and increased external funding. The team noted the importance of continued attention to financial planning, including developing scenario-based budget projections, long-term financial forecasting, and careful monitoring of cash flow and debt obligations.

Overall, the institutional report and the interviews provide a coherent understanding of the institution's current state and demonstrate a willingness to engage in honest self-reflection. The team noted strengths and areas for continued development, particularly in strengthening documentation of assessment processes, financial planning, and institutional infrastructure.

These efforts position KGI to continue advancing institutional effectiveness as it moves toward greater stability and organizational maturity.

#### **Subsection D: Compliance with 2023 WSCUC Standards**

The team's findings, subject to Commission review, are that the institution is in compliance with the four standards through analysis of the institutional report, supporting evidence, and observations during the visit, including meetings with institutional leadership, faculty, staff, students, and governance board. Based on this review, the team found that the institution has provided sufficient evidence to demonstrate compliance with the standards. The following narrative summarizes the team's observations, findings, and recommendations related to each Standard.

#### **Standard 1**

The team's findings, which are subject to Commission review, are that the institution has provided sufficient evidence to determine compliance with Standard 1. KGI has clarity in its mission, purpose, and values. The institution enjoys a collaborative and inclusive culture deeply committed to the success of its students and to the future of the institution. During this time of rapid changes in operations and academic offerings, leadership has fostered a culture of transparency and integrity.

#### **Standard 2**

The team's findings, which are subject to Commission review, are that the institution has provided sufficient evidence to determine compliance with Standard 2. The institution documented that its degree programs are coherent, comprehensive, and intellectually stimulating

educational experiences with clear entry requirements and expected learning outcomes. The institution demonstrated that the intended learning outcomes and performance learning outcomes are effectively evaluated, and results are acted upon. The institution provided evidence that program reviews are completed and that results are used to improve.

The institution demonstrated that faculty ensure quality and serve as designers and assessors of students' performance in programs. The institution described how and by whom expected levels of achievement for each degree program are established. The institutional learning outcomes are being redesigned to include expectations for degree recipients and define the areas of knowledge, skills, abilities, and values that graduates are expected to acquire. The institution provided evidence that graduates have learned and are able to do what the degree programs intend. The institution has shown that students can progress in and complete degree programs in a timely manner.

### **Standard 3**

The team's findings, which are subject to the Commission review, are that the institution has provided sufficient evidence to determine compliance with Standard 3. KGI, less than 30 years old, is in the process of transitioning from a "start up" to a sustainable and mature educational institution as characterized by the trustees, the new president and their 2030 Strategic Plan. The president has assembled a highly functioning and well-qualified leadership team that engages in transparent decision making and effective communications while enhancing administrative support for the faculty and staff to meet the institution's educational, student support and administrative goals. KGI benefits from a Board of Trustees with a range of

applicable background, knowledge and skills that provides effective oversight and engagement in strategic, policy, performance and fiscal matters.

While the institution has a strong set of assets, it has experienced significant operational deficits for three years (FY24, FY25, FY26 projected) that are contributing to a growing level of debt and cash flow challenges. The administration is deeply engaged in the goal of increasing enrollments by expanding and realigning their academic offerings, strengthening their recruiting process, and improving their brand visibility nationally. The anticipated growth in enrollments as well as philanthropy should alleviate the financial pressures over time. In the meantime, KGI needs to develop more realistic budgets, carefully monitor debt and cash flow, as well as incorporate planned facility and personnel costs into their financial forecasting to assure they can achieve their strategic growth goals.

#### **Standard 4**

The team's findings, which are subject to Commission review, are that the institution meets the expectations of Standard 4 by demonstrating a clear and consistent commitment to quality assurance and improvement. At the institution, this commitment is evident not only in the use of assessment and evaluation to inform planning and decision-making, but also in the institution's impressive and intentional engagement with stakeholders. Broad-based input from the campus community is always done, and the feedback is then incorporated into the task at hand. This is especially evident in the development of the Strategic Plan. Furthermore, through standardized program-level assessment, the institution shows that its improvement process is active, effective, and embedded across its programs.

## **Section III – Commendations and Recommendations**

### **COMMENDATIONS**

The team commends KGI for the following:

1. Fostering a culture of faculty engagement as demonstrated in the revision of workload guidelines and policies.
2. Strong retention and on-time graduation rates.
3. Broad participation across stakeholders in development of the new Strategic Plan that reflects a shared commitment among the faculty, staff, leadership, board, alumni and industry stakeholders to a strong future for KGI.
4. Transparent communication throughout the organization and a culture that reflects mutual respect, collegiality, and commitment to the mission.

### **RECOMMENDATIONS**

The team recommends KGI for the following:

1. Continue progress in establishing administrative operating policies and business procedures. (CFR 1.4)
2. Expand systematic tracking of students' outcomes following graduation across all programs and use the results to inform program improvement. (CFR 2.11)
3. Develop and formalize a documented, institution-wide assessment process for student support and co-curricular services that ensure results are systematically used for improvement, including analysis of student achievement of program learning outcomes within program review. (CFRs 2.4, 2.14, 4.3)

4. Create and implement a hiring plan that aligns with the strategic plan to ensure that the institution's educational objectives are met. (CFR 3.1)
5. Ensure that the institution is financially stable and has resources sufficient for long-term sustainability (CFRs 3.4, 3.5)
  - a. Develop scenario-based five-year financial projections based on the different enrollment levels.
  - b. Develop budget scenarios based on different projected enrollment outcomes.
  - c. Create a multi-year capital expenditure plan and assess how this will affect overall debt projections and cash flow.
6. Develop a comprehensive facilities master plan along with a deferred maintenance schedule and document the impact on debt, operations, and cash flow to inform future resource allocations. (CFR 3.6)
7. Develop an institution-wide framework for data governance that supports systematic tracking, analysis, and dissemination of data, ensuring that evidence is consistently applied in institutional decision-making. (CFRs 3.6, 3.10)

## **Appendices**

The report includes the following appendices:

### **A. Federal Compliance Forms**

Credit Hour and Program Length Review

Marketing and Recruitment Review

Student Complaints Review

Transfer Credit Review

### **B. Distance Education Review**

# Federal Compliance Forms

## Overview

There are four forms that WSCUC uses to address institutional compliance with some of the federal regulations affecting institutions and accrediting agencies:

1. Credit Hour and Program Length Review Form
2. Marketing and Recruitment Review Form
3. Student Complaints Form
4. Transfer Credit Policy Form

As part of the institutional report preparation, the institution completes these forms and submits them with the institutional report. During the visit, teams validate the information on the four forms and add them as an appendix to the Team Report. Teams are not required to include a narrative about any of these matters in the team report but may include recommendations, as appropriate, in the Findings, Commendations, and Recommendations section of the team report.

## Credit Hour and Program Length Review Form

Under federal regulations, WSCUC is required to demonstrate that it monitors the institution's credit hour policy and processes as well as the lengths of its programs.

### Credit Hour - §602.24(f)

The accrediting agency, as part of its review of an institution for renewal of accreditation, must conduct an effective review and evaluation of the reliability and accuracy of the institution's assignment of credit hours.

1. The accrediting agency meets this requirement if-
  - i. It reviews the institution's-
    - A. Policies and procedures for determining the credit hours, as defined in 34 CFR 600.2, that the institution awards for courses and programs; and
    - B. The application of the institution's policies and procedures to its programs and coursework; and
  - ii. Makes a reasonable determination of whether the institution's assignment of credit hours conforms to commonly accepted practice in higher education.
2. In reviewing and evaluating an institution's policies and procedures for determining credit hour assignments, an accrediting agency may use sampling or other methods in the evaluation.

**Credit hour** is defined by the Department of Education as follows:

A credit hour is an amount of work represented in intended learning outcomes and verified by evidence of student achievement that is an institutionally established equivalency that reasonably approximates not less than—

1. One hour of classroom or direct faculty instruction and a minimum of two hours of out of class student work each week for approximately fifteen weeks for one semester or

- trimester hour of credit, or ten to twelve weeks for one quarter hour of credit, or the equivalent amount of work over a different amount of time; or
2. At least an equivalent amount of work as required in paragraph (1) of this definition for other academic activities as established by the institution including laboratory work, internships, practica, studio work, and other academic work leading to the award of credit hours.

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

### Program Length - §602.16(a)(1)(viii)

Program length may be seen as one of several measures of quality and as a proxy measure for scope of the objectives of degrees or credentials offered. Traditionally offered degree programs are generally approximately 120 semester credit hours for a bachelor's degree, and 30 semester credit hours for a master's degree; there is greater variation at the doctoral level depending on the type of program. For programs offered in non-traditional formats, for which program length is not a relevant and/or reliable quality measure, reviewers should ensure that available information clearly defines desired program outcomes and graduation requirements, that institutions are ensuring that program outcomes are achieved, and that there is a reasonable correlation between the scope of these outcomes and requirements and those typically found in traditionally offered degrees or programs tied to program length.

## Credit Hour and Program Length Review Form

| Material Reviewed                                          | Questions/Comments (Please enter findings and recommendations in the Comments sections as appropriate.)                                                                                                                                                                                     |
|------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Policy on credit hour                                      | Is this policy easily accessible? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO                                                                                                                                                                                       |
|                                                            | If so, where is the policy located? <a href="https://www.kgi.edu/resources/documents/policies/credit-hours-policy.pdf">https://www.kgi.edu/resources/documents/policies/credit-hours-policy.pdf</a>                                                                                         |
|                                                            | Comments:                                                                                                                                                                                                                                                                                   |
| Process(es)/ periodic review of credit hour                | 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)? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO |
|                                                            | If so, does the institution adhere to this procedure? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO                                                                                                                                                                   |
|                                                            | Comments: KGI uses the new course approval process and periodic audits to ensure compliance                                                                                                                                                                                                 |
| Schedule of on-ground courses showing when they meet       | Does this schedule show that on-ground courses meet for the prescribed number of hours? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO                                                                                                                                 |
|                                                            | Comments: <a href="https://student.kgi.edu/registrar/class-schedules.html">https://student.kgi.edu/registrar/class-schedules.html</a>                                                                                                                                                       |
| Sample syllabi or equivalent for online and hybrid courses | How many syllabi were reviewed? 5                                                                                                                                                                                                                                                           |
|                                                            | What kind of courses (online or hybrid or both)? Both                                                                                                                                                                                                                                       |
|                                                            | What degree level(s)? <input type="checkbox"/> AA/AS <input type="checkbox"/> BA/BS <input checked="" type="checkbox"/> MA <input checked="" type="checkbox"/> Doctoral                                                                                                                     |

|                                                                                                                                                                                                                               |                                                                                                                                                                        |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Please review at least 1 - 2 from each degree level.                                                                                                                                                                          | What discipline(s)? MA Level - BUS, SCI, GENE; Doctoral Level - OCTH, PHAR                                                                                             |
|                                                                                                                                                                                                                               | 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)<br>Please review at least 1 - 2 from each degree level. | How many syllabi were reviewed? 4                                                                                                                                      |
|                                                                                                                                                                                                                               | What kinds of courses? Lab, Clinical, Fieldwork                                                                                                                        |
|                                                                                                                                                                                                                               | What degree level(s)? <input type="checkbox"/> AA/AS <input type="checkbox"/> BA/BS X MA X Doctoral                                                                    |
|                                                                                                                                                                                                                               | What discipline(s)? MA Level – ENG, GENE; Doctoral Level – OCTH, PHAR                                                                                                  |
|                                                                                                                                                                                                                               | 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? 4                                                                                                                                     |
|                                                                                                                                                                                                                               | What kinds of programs were reviewed? MS, OTD, MSPA, PharmD                                                                                                            |
|                                                                                                                                                                                                                               | What degree level(s)? <input type="checkbox"/> AA/AS <input type="checkbox"/> BA/BS X MA X Doctoral                                                                    |
|                                                                                                                                                                                                                               | What discipline(s)? Applied Life Sciences, Occupational Therapy, Physician Associate, PharmD                                                                           |
|                                                                                                                                                                                                                               | Does this material show that the programs offered at the institution are of a generally acceptable length? X YES <input type="checkbox"/> NO                           |
|                                                                                                                                                                                                                               | Comments: <a href="https://student.kgi.edu/registrar/graduation-requirements.html">https://student.kgi.edu/registrar/graduation-requirements.html</a>                  |

Review Completed By: Susana Santos  
Date: 2/2026

## Marketing and Recruitment Review Form

Under federal regulation\*, WSCUC is required to demonstrate that it monitors the institution's recruiting and admissions practices.

| Material Reviewed          | Questions and Comments: Please enter findings and recommendations in the comment section of this table as appropriate.                                                                                                                                                                                                                                                                 |
|----------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| **Federal regulations      | Does the institution follow federal regulations on recruiting students?<br>X YES <input type="checkbox"/> NO                                                                                                                                                                                                                                                                           |
|                            | Comments: KGI follows Section 487(a)(20) of the HEA.                                                                                                                                                                                                                                                                                                                                   |
|                            | MRA – Reviewed and institution provided the necessary information.                                                                                                                                                                                                                                                                                                                     |
| Degree completion and cost | Does the institution provide information about the typical length of time to degree?<br>X YES <input type="checkbox"/> NO                                                                                                                                                                                                                                                              |
|                            | Does the institution provide information about the overall cost of the degree?<br>X YES <input type="checkbox"/> NO                                                                                                                                                                                                                                                                    |
|                            | Comments:<br>Degrees - <a href="https://www.kgi.edu/degrees-and-programs/index.html">https://www.kgi.edu/degrees-and-programs/index.html</a><br>Cost of Attendance- <a href="https://www.kgi.edu/financial-aid/cost-of-attendance.html">https://www.kgi.edu/financial-aid/cost-of-attendance.html</a><br><br>MRA – PE reviewed and the institution provided the necessary information. |
| Careers and employment     | Does the institution provide information about the kinds of jobs for which its graduates are qualified, as applicable? X YES <input type="checkbox"/> NO                                                                                                                                                                                                                               |
|                            | Does the institution provide information about the employment of its graduates, as applicable?<br>X YES <input type="checkbox"/> NO                                                                                                                                                                                                                                                    |
|                            | Comments: E.g. - <a href="https://www.kgi.edu/degrees-and-programs/biotechnology/master-of-business-and-science.html">https://www.kgi.edu/degrees-and-programs/biotechnology/master-of-business-and-science.html</a><br><br>MRA – Reviewed and the institution provided the necessary information.                                                                                     |

\*§602.16(a)(1)(vii)

\*\*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 regulations 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: Matt Ankenbrandt  
Date: 2/20/2026

## Student Complaints Review Form

Under federal regulation\*, WSCUC is required to demonstrate that it monitors the institution's student complaints policies, procedures, and records.

| Material Reviewed            | Questions/Comments (Please enter findings and recommendations in the comment section of this column as appropriate.)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
|------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Policy on student complaints | <p>Does the institution have a policy or formal procedure for student complaints?<br/>X YES <input type="checkbox"/> NO</p> <p>If so, is the policy or procedure easily accessible? Is so, where?<br/><a href="https://www.kgi.edu/resources/documents/policies/complaint-policy.pdf">https://www.kgi.edu/resources/documents/policies/complaint-policy.pdf</a></p> <p>2024/25 Academic Policy Handbook - <a href="https://kgi.app.box.com/v/academic-handbook">https://kgi.app.box.com/v/academic-handbook</a></p> <p>Comments:<br/>The Team has reviewed and found the policy easily accessible.</p>                                                                                                                                             |
| Process(es)/ procedure       | <p>Does the institution have a procedure for addressing student complaints?<br/>X YES <input type="checkbox"/> NO</p> <p>If so, please describe briefly:<br/>Complaints are heard at the appropriate level and if they are not resolved they are elevated through the administrative hierarchy with the final level at the Office of the Provost. The Office of the Provost will then hear formal grievances and will attempt to resolve the complaint appropriately.</p> <p>If so, does the institution adhere to this procedure? X YES <input type="checkbox"/> NO</p> <p>Comments:<br/>The team has found that KGI adheres to its policies and procedure with regard to student complaints. This was also checked in meeting with students.</p> |
| Records                      | <p>Does the institution maintain records of student complaints? X YES <input type="checkbox"/> NO</p> <p>If so, where? The Office of the Provost</p> <p>Does the institution have an effective way of tracking and monitoring student complaints over time? X YES <input type="checkbox"/> NO</p> <p>If so, please describe briefly:<br/>The Office of the Provost tracks formal grievances that have elevated to the Office of the Provost and monitors them over time.</p> <p>Comments:<br/>KGI has an effective way to track student complaints</p>                                                                                                                                                                                             |

\*§602-16(1)(1)(ix)

See also WASC Senior College and University Commission's Complaints and Third Party Comment Policy.

Review Completed By: Sheryl Berman. Ph.D

Date: 2/20/2026

## Transfer Credit Policy Review Form

Under federal regulations\*, WSCUC is required to demonstrate that it monitors the institution's recruiting and admissions practices accordingly.

| Material Reviewed         | Questions/Comments (Please enter findings and recommendations in the comment section of this column as appropriate.)                                                                                                                                                                                                                                                                                                                                                      |
|---------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Transfer Credit Policy(s) | Does the institution have a policy or formal procedure for receiving transfer credit?<br>X YES <input type="checkbox"/> NO                                                                                                                                                                                                                                                                                                                                                |
|                           | If so, is the policy publicly available? X YES <input type="checkbox"/> NO<br>If so, where? Overview- <a href="https://www.kgi.edu/future-students/apply-now.html">https://www.kgi.edu/future-students/apply-now.html</a><br>Policy- <a href="https://kgi.app.box.com/v/academic-handbook">https://kgi.app.box.com/v/academic-handbook</a><br>- to be updated for 2025/26                                                                                                 |
|                           | 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?<br>X YES <input type="checkbox"/> NO                                                                                                                                                                                                                                                            |
|                           | Comments: The institution states that it typically does not accept transfer credit "due to the unique nature of our courses," but students can contact the admissions counselors of the program in question to see if specific courses will transfer.<br><br>There is also a Transfer Credit Request Form<br>( <a href="https://student.kgi.edu/resources/documents/Transfer-Credit-Form.pdf">https://student.kgi.edu/resources/documents/Transfer-Credit-Form.pdf</a> ). |

\*§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: Susana Santos  
Date: 2/20/2026

# Distance Education Review-Team Report

## Appendix

Institutions must have WSCUC approval to utilize distance education in the delivery of any of its programs in any amount, and are required to seek WSCUC approval for programs where 50% or more of the program can be completed through distance education. The institution's use of distance education in the delivery of its programs is reviewed as part of a comprehensive evaluation of the institution including an Accreditation Visit or Seeking Accreditation Visit.

**Distance Education** is defined as:

Education that uses one or more of the technologies listed below to deliver instruction to students who are separated from the instructor or instructors and to support **regular and substantive interaction** between the students and the instructor or instructors, either synchronously or asynchronously. The technologies that may be used to offer distance education include:

- The internet;
- One-way and two-way transmissions through open broadcast, closed circuit, cable, microwave, broadband, fiber optic, satellite, or wireless communication devices;
- Audioconference;
- Other media used in a course in conjunction with any of the technologies listed in this definition

In keeping with federal expectations, WSCUC requires institutions that utilize distance education in the delivery of programs to demonstrate "Faculty-Initiated Regular and Substantive Interaction" and "Academic Engagement" as defined by the federal regulations (see Code of Federal Regulations §600.2).

**Regular and Substantive Interaction** is engaging students in teaching, learning, and assessment, consistent with the content under discussion, and also includes at least two of the following:

- (i) Providing direct instruction;
- (ii) Assessing or providing feedback on a student's coursework;
- (iii) Providing information or responding to questions about the content of a course or competency;
- (iv) Facilitating a group discussion regarding the content of a course or competency; or
- (v) Other instructional activities approved by the institution's or program's accrediting agency.

An institution ensures regular interaction between a student and an instructor or instructors by, prior to the student's completion of a course or competency -

- (i) Providing the opportunity for substantive interactions with the student on a predictable and scheduled basis commensurate with the length of time and the amount of content in the course or competency; and
- (ii) Monitoring the student's academic engagement and success and ensuring that an instructor is responsible for promptly and proactively engaging in substantive interaction with the student when needed on the basis of such monitoring, or upon request by the student.

**Academic Engagement** requires active participation by a student in an instructional activity related to the student's course of study that -

(1) Is defined by the institution in accordance with any applicable requirements of its State or accrediting agency;

(2) Includes, but is not limited to -

- (i) Attending a synchronous class, lecture, recitation, or field or laboratory activity, physically or online, where there is an opportunity for interaction between the instructor and students;
- (ii) Submitting an academic assignment;
- (iii) Taking an assessment or an exam;
- (iv) Participating in an interactive tutorial, webinar, or other interactive computer-assisted instruction;
- (v) Participating in a study group, group project, or an online discussion that is assigned by the institution; or
- (vi) Interacting with an instructor about academic matters

Please complete either Section A for institutions that offer distance education programs approved by WSCUC or are 100% distance education institutions OR Section B for institutions that utilize distance education in the delivery of programs that do not rise to the level of a WSCUC approved distance education program.

**Institution:** Keck Graduate Institute (KGI)

**Type of Visit:** Reaffirmation

**Name of reviewer/s:** Sheryl Berman, Ph.D and Pamela Eibeck, Ph.D

**Date/s of review:** 9/15/2025 - 1/30/2026

**Section Completed:** X A OR    B

A completed copy of this form should be appended to the team report for all comprehensive visits and for other visits as applicable. Teams can use the institutional report to begin their investigation, then, use the visit to confirm claims and further surface possible concerns. Teams are not required to include a narrative about this in the team report but may include recommendations, as appropriate, in the Findings and Recommendations section of the team report.

#### **SECTION A:** Institutions with Approved Distance Education Programs

1. Programs and courses reviewed (please list)

Programs:

Master of Biotechnology Management (MBM)  
Certificate in Bioscience Management (CBM)  
Biocon Academy Certificate

Courses:

BUS 5000 – Introduction to Bioscience Industries  
BUS 5110- Corporate Finance  
BUS 5300 – Competitive Strategy  
REG 5000 – Introduction to Food and Drug Laws & Regulations  
MSCM 5001 – Community Medicine & Social Determinants of Health  
BENG 6140 – Bioseparations Engineering & Science

2. Background Information (number of programs offered by distance education; degree levels; FTE enrollment in distance education courses/programs; history of offering distance education; percentage growth in distance education offerings and enrollment; platform, formats, and/or delivery method)

KGI currently enrolls students in two masters level programs (Master of Biotechnology Management (MBM) and Master of Community Health Administration (MCHA)) and in multiple certificates (e.g. Biocon Academy, Certificate in Bioscience Management

(CBM)) via distance education. (See Exhibit A.01 – [List of Past, Present, and Future Degree and Certificate Programs](#) for more details).

The MBM and MCHA programs are both built using a stackable certificate model, and utilize the multiple distance education-based certificates that KGI offers as a foundation for the degrees. While KGI has been offering distance education programs since 2013, a majority of its programs and student body are still engaged on-site (90.4% of KGI students (unduplicated headcount) were enrolled in on-site programs in Fall of 2024 - See Exhibit A.03 – [KGI Fall Enrollment History](#) for more details).

KGI has slowly increased the number of distance education programs and certificates offered since 2013 (one in 2013 vs seven in 2025), as it works to adjust to changes in market demand, while seeking to maintain its high educational standards and excellent educational outcomes (See Exhibit 2.02 – [Longitudinal Retention Rates by Program](#) and Exhibit 2.04 – [Longitudinal On-Time Graduation Rates by Program](#) for examples).

KGI is also in the process of sunsetting a few of its distance education programs given weak enrollment and student demand (e.g., the Master of Science in Community Medicine (MSCM)). KGI's distance education programs utilize the same LMS as our on-site programs (Canvas) and are taught in both online synchronous and online asynchronous formats.

3. Nature of the review (material examined and persons/committees interviewed):

Six courses were reviewed (listed above) and in-person discussions were held with distance education faculty and academic leadership.

## Observations and Findings

| Lines of Inquiry                                                                                                                                                                                                                                                            | Observations and Findings                                                                                                                                                                                                                                                                                                                                   | Follow-up Required (identify the issues) |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------|
| <p><i>Fit with Mission.</i> How does the institution conceive of distance learning relative to its mission, operations, and administrative structure? How are distance education offerings planned, funded, and operationalized?</p>                                        | <p>KGI is committed to using technology to increase access to its programs and to introduce new programs and certificates. The distance education programs appear to closely aligned with KGI's mission. Canvas is the Learning Management System. Distance ed courses and programs can be proposed by faculty, deans, provost or senior administration</p> |                                          |
| <p><i>Connection to the Institution.</i> How are distance education students integrated into the life and culture of the institution?</p>                                                                                                                                   | <p>All courses appear to offer guidelines to personal wellness, accessibility and personal support. Online orientation is present for all students. Distance ed students are provided access to wellness information, career services and support in line with all KGI students.</p>                                                                        |                                          |
| <p><i>Quality of the DE Infrastructure.</i> Are the learning platform and academic infrastructure of the institution conducive to learning and interaction between faculty and students and among students? Is the technology adequately supported? Are there back-ups?</p> | <p>Technology appears to be supported. Canvas is an excellent platform. It appears all classes that were examined stress interaction between faculty and students. IT support is present through KGI and also via Canvas Infrastructure</p>                                                                                                                 |                                          |

|                                                                                                                                                                                                                                                                                                                                                                                                                                                          |                                                                                                                                                                                                                                                                                                                                                                                                |                                                                                                       |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------|
| <p><i>Student Support Services:</i> What is the institution's capacity for providing advising, counseling, library, computing services, academic support and other services appropriate to distance modality? What do data show about the effectiveness of the services?</p>                                                                                                                                                                             | <p>All the students utilize the Claremont Libraries online access. Registrar, IT support, Student support services are through KGI</p>                                                                                                                                                                                                                                                         | <p>Recommended specific assessment of the effectiveness of these services for distant ed students</p> |
| <p><i>Faculty.</i> Who teaches the courses, e.g., full-time, part-time, adjunct? Do they teach only online courses? In what ways does the institution ensure that distance learning faculty are oriented, supported, and integrated appropriately into the academic life of the institution? How are faculty involved in curriculum development and assessment of student learning? How are faculty trained and supported to teach in this modality?</p> | <p>Faculty Members are mostly full time. Approximately one third of distant ed faculty are adjunct. Faculty are required to attend course specific meetings, general faculty meetings and are evaluated by peers, deans and students, Full time faculty contribute to curriculum development. Training of online faculty are through faculty development and Instructional design services</p> |                                                                                                       |
| <p><i>Curriculum and Delivery.</i> Who designs the distance education programs and courses? How are they approved and evaluated? Are the programs and courses comparable in content, outcomes and quality to on-ground offerings? (Submit credit hour report.)</p>                                                                                                                                                                                       | <p>The programs are designed and improved by faculty and Deans and senior leadership. The President, Cabinet and Provost approves new programs and major/substantial changes with input from Deans. department chairs and faculty</p>                                                                                                                                                          |                                                                                                       |
| <p><i>Faculty Initiated Regular and Substantive Interaction.</i> How does the institution ensure compliance with the federal expectation for "faculty-initiated, regular and substantive interaction"? How is compliance monitored? What activities count as student/instructor substantive interaction"?</p>                                                                                                                                            | <p>All courses examined have requirements for discussion and adequate assignments to show engagement compliance</p>                                                                                                                                                                                                                                                                            |                                                                                                       |

|                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |                                                                                               |                                                                                                                                                                                                    |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <i>Academic Engagement.</i> How does the institution ensure compliance with the federal expectation for “Academic Engagement”? How is compliance monitored? What activities contribute to academic engagement?                                                                                                                                                                                                                                                                                                                                    | Discussions, group work, presentations, quizzes,, exams all contribute to academic engagement |                                                                                                                                                                                                    |
| <i>State Licensure Requirements.</i> Describe, as appropriate, the institution’s process for disclosing to students how state licensure requirements are met by distance education programs, whether licensure requirements are not met by programs, or whether the institution has not determined where licensure requirements are met by the programs.                                                                                                                                                                                          | NA                                                                                            |                                                                                                                                                                                                    |
| <i>Student Identification Verification and Privacy.</i> What is the institution’s process for student verification, e.g., a secure login and pass code; proctored examinations; other technologies or practices that are effective in verifying student identification? What precautions are taken by the institution to protect technology from cyber security intrusions on its or outsourced systems? Are additional student charges associated with the verification of student identity disclosed at the time of registration or enrollment? | Exam verification of student identity is via Canvas for ExamSoft, depending on the program.   | Discussion about verification of student identity in the age of AI is encouraged. Suggest greater protection through education of KGI population (students, Staff and faculty) about cybersecurity |
| <i>Retention and Graduation.</i> What data on retention and graduation are collected on students taking online courses and programs? What do these data show? What disparities are evident? Are rates comparable to on-ground programs and to other institutions’ online offerings? If any concerns exist, how are these being addressed?                                                                                                                                                                                                         | Retention and graduation data for online, hybrid and in person classes are all quite good     |                                                                                                                                                                                                    |

|                                                                                                                                                                                                                                                                                                                                                |                                                                                                                                                                                      |                                                                                                                                                            |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <i>Student Learning.</i> How does the institution assess student learning for online programs and courses? Is this process comparable to that used in on-ground courses? What are the results of student learning assessment? How do these compare with learning results of on-ground students, if applicable, or with other online offerings? | Assessment is done for all classes and programs including hybrid, distant ed (synchronous and asynchronous course and on ground courses) Rubrics may be used for course assessments. | Recommend additional specific assessment of effectiveness of teaching in distance formats and closing the loop on assessment with supporting documentation |
| <i>Contracts with Vendors.</i> Are there any arrangements with outside vendors concerning the infrastructure, delivery, development, or instruction of courses? If so, do these comport with the policy on <i>Agreements with Unaccredited Entities</i> ?                                                                                      | NA                                                                                                                                                                                   |                                                                                                                                                            |
| <i>Quality Assurance Processes:</i> How are the institution's quality assurance processes designed or modified to cover distance education? What evidence is provided that distance education programs and courses are educationally effective?                                                                                                | Online orientation has been instituted for all students. Courses evals are reviewed. Spot checks of distant ed courses are performed, especially for new faculty                     | Recommend additional specific assessment of effectiveness of teaching in distance formats and closing the loop on assessment with supporting documentation |

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*Revised April 2023*