Evaluation of Institutional Effectiveness (Year 7)Peer-Evaluation Report

Western Oregon University

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NWCCU Liaison to the Peer Evaluation Team:

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A confidential report of findings prepared for the Northwest Commission on Colleges and Universities

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I. Introduction

A five-person peer evaluation team conducted a Year Seven Evaluation of Institutional Effectiveness (EIE) visit to Western Oregon University (WOU) from April 12-14, 2023, in response to the *Year Seven Self-Evaluation Report* submitted by the university to NWCCU. The team also visited Western Oregon University's additional site in Salem, OR. The comprehensive visit covered Standard One, elements from Standard Two identified as needing follow-up from the Year-Six Policies, Regulations, and Financial Review (PRFR) report, a distance education addendum and one outstanding recommendation.

II. Assessment of Self-Evaluation and Support Materials

The evaluation team wishes to thank Western Oregon University for completing a self-study that is forthright in articulating authentic strengths and clearly stating the challenges the intuition faces. The self-study was prepared and distributed to evaluators in a timely manner. It covered all the areas required by NWCCU. The self-study was professionally prepared and well organized following the flow of the standards. The self-study was well-written and candid regarding areas of institutional weakness and challenges facing the institution, including a section of next steps following each section of the report. In particular, the evaluation team wishes to thank the institution for their collaborative work in preparing the self-study. Interview requests during the site visit were expeditiously handled and questions from the evaluation team were addressed promptly and effectively.

III. Visit Summary

Over the course of 2 ½ days, the evaluation team met on campus with members of the Board of Trustees, administrative leadership, faculty, students and staff of Western Oregon University. The interviews occurred in individual, small groups, and in larger open meetings. Individual and small group meetings included the executive team, members of the distance education staff, faculty program leads, general education committee members, Human Resources, the financial team, student affairs staff, Institutional Research, faculty leadership, facilities and student support and advising staff. The open meeting with faculty had 8 attendees, the student open meeting had 6 attendees and the staff open meeting had 25 attendees.

IV. Topics Addressed as an Addendum to the Self-Evaluation Report

The institution included three addendums to the reports: 1) a response to the Year 6 PRFR findings 2) a response to Recommendation 1 from the 2019 Mid-Cycle visit and 3) the distance education response required by NWCCU.

Response to Year Six PRFR

The evaluation team evaluated the response to the PRFR in Standard 2. More detail is available in that section of this report.

Response to Recommendation 1 (2019)

The evaluation team was charged with evaluating the recommendation made in 2016, and renewed in 2019 that "The evaluation committee recommends that the institution engage in comprehensive, ongoing, systematic assessment that leads to mission fulfillment through the evaluation of core theme objectives and support of continuous improvement" as part of the team's analysis of Standard 1B. More detail is available in that section of this report.

Distance Ed Addendum

The evaluation team was responsible for reviewing the institution's compliance with the NWCCU's Distance Education Policy. The institution responded to the first three elements of this policy in its PRFR report, thus the on-site evaluation team focused on the fourth element of the policy: academic policies and procedures for instructors to implement requirements for regular and substantive interactions (RSI) in Distance Education courses or programs.

The Center for Academic Innovation is broadly responsible for teaching technology training, pedagogical best practices training, support for course design and troubleshooting in distance education. Staff affiliated with the Center reported that discussion boards and assignment feedback are the most common forms of RSI in asynchronous online classes, which are the majority of online course offerings.

WOU offers a robust array of training courses of varied levels of breadth, depth, and time commitment. The peer evaluation team noted that the Center takes time to consider the effectiveness of their training course topics, course structure and the organization of training course series to maximize the learning experience for faculty. The peer evaluation team observed that careful attention is paid to faculty feedback and articulation of needs with a goal of building course series that continue to fill gaps in distance education training and help keep the technology from being a barrier to faculty training in online course delivery with robust RSI.

The foundation for a robust and strong online course and program delivery system and culture is present. Monitoring RSI is built into faculty evaluation processes as well as support ticket monitoring. Since a large percentage of online teaching is involves full time

non tenure track faculty, evaluation of teaching occurs every year and this provides a robust opportunity to track RSI in online coursework. Tenure track faculty include teaching observations as part of tenure and promotion processes. The Center also works closely with chair and division leaders so they can, in their review of faculty, evaluate RSI in online teaching. Support tickets from students also provide some insight into the quality of RSI and the staff track those tickets to identify opportunities to provide faculty with additional support and training in quality RSI.

<u>Concern</u>: The evaluation team observed that many, if not all, of the requirements for RSI are present in practice, but not clearly articulated as a matter of policy that are consistently communicated to all faculty.

<u>Compliment</u>: The Center for Academic Innovation staff overseeing the technical interface and instruction in pedagogical best practices for distance education at Western Oregon University is a point of institutional strength. Collaboration is evident in team interactions. The evaluation team noted that mutual respect and trust between staff exists. This trusting relationship is and will be essential and a source of strength for the institution as it moves towards mission fulfillment.

V. Standard 1: Student Success and Institutional Mission and Effectiveness

- a. Standard 1.A: Institutional Mission
 - i. 1.A.1

1.A.1 The institution's mission statement defines its broad educational purposes and its commitment to student learning and achievement.,

Western Oregon University's mission statement, which was adopted by the Board of Trustees in 2017 is, "Western Oregon University creates lasting opportunities for student success through transformative education and personalized support." This mission statement is defined by the institution as met when teaching and learning is designed to empower learners to find coherence between school and the world beyond the classroom and to make informed decisions and take actions as individuals and as community members, both locally and globally. Additionally, WOU believes that personalized student support, which is operationalized as adding a familiar human touch to every interaction, reducing barriers, and continually adjusting to meet a learner's specific needs, abilities, and expectation, is inherent in its mission. Throughout the evaluation team's interactions, it was apparent that all faculty, staff and administration embrace the institution's mission, and that the mission supports student learning and achievement.

Compliment: Faculty, staff and administration are deeply connected to the institution's mission as evidenced by their dedication to cooperation and collaboration to support student success.

- b. Standard 1.B: Improving Institutional Effectiveness
 - i. 1.B.1

1.B.1 The institution demonstrates a continuous process to assess institutional effectiveness, including student learning and achievement and support services. The institution uses an ongoing and systematic evaluation and planning process to inform and refine its effectiveness, assign resources, and improve student learning and achievement.

The University focuses on mission fulfillment by defining two over-arching objectives: Student Success and Student Achievement. The new institutional governance system established in 2017 is designed to utilize multiple advisory committees to create opportunities for mission alignment. The infrastructure created worked well when all committees were fully integrated and aligned into the planning and decision-making process and the committees met regularly. Unfortunately, this consistency ceased due to the COVID pandemic and multiple leadership changes. The institution also does not demonstrate that its objectives and measures are communicated by leadership to all campus stakeholders or used to support continuous improvement and decision-making. While the evaluation team found strong communication among the executive level and mid-levels of the organization, communication was inconsistent between the decision-making bodies and some committees and front-line faculty and staff.

Concern: While there is evidence that WOU's mission is central to the efforts taking place around campus to evaluate institutional effectiveness, the processes put in place to support and track mission fulfillment and continuous improvement are not actively utilized as part of the decision-making process.

ii. 1.B.2

1.B.2 The institution sets and articulates meaningful goals, objectives, and indicators of its goals to define mission fulfillment and to improve its effectiveness in the context of and in comparison, with regional and national peer institutions.

The University has created a mission fulfillment model that could support data-driven decision-making; however, the current objectives and measures are not aligned with the existing strategic plan and lack the refinement required to provide leadership with the situational awareness necessary for decision-making and continuous improvement, directly affecting mission fulfillment.

Concern: The institution has not aligned its current objectives and measures with the existing strategic plan.

iii. 1.B.3

1.B.3 The institution provides evidence that its planning process is inclusive and offers opportunities for comment by appropriate constituencies, allocates necessary resources, and leads to improvement of institutional effectiveness.

Planning efforts at the University are occurring inclusively, as demonstrated by the membership of the strategic planning committee and the standing committees that support the University Council, but the level of transparency provided by the committees is inconsistent. The evaluation team found that some committees were able to articulate their mission and role in the university and others were unclear as to their charge or

connection to the larger governance structure. The evaluation team was unclear how planning committees interact with one another to ensure integrated planning is occurring throughout the University and how those planning efforts outside of the committee structure are incorporated. While there was evidence that the University has an authentic commitment to increasing transparency and inclusion in decision making, there is still a need to involve a broader range of people across campus.

iv. 1.B.4

1.B.4 The institution monitors its internal and external environments to identify current and emerging patterns, trends, and expectations. Through its governance system it considers such findings to assess its strategic position, define its future direction, and review and revise, as necessary, its mission, planning, intended outcomes of its programs and services, and indicators of achievement of its goals.

The institution has faced significant internal and external challenges including a continuous drop in enrollment over the past 10 years, the dissolution of the Oregon University System, a decline in state support for higher education, shifting student demographics and the COVID pandemic. While the institution has made some attempts to address budget shortfalls that have resulted from these challenges, the evaluation team was unable to discern that the institution has adjusted its business practices and instructional resourcing. The institution developed an internal Institutional Research capability in 2021 and has more effectively utilized data collection and analysis to understand its internal and external environments. Faculty and staff planning efforts use data to develop actions focused on strategic decision-making, including seeking to become an HSI and improving student success revolving around retention and graduation rates.

Standard 1.C: Student Learning

v. 1.C.1

1.C.1 The institution offers programs with appropriate content and rigor that are consistent with its mission, culminate in achievement of clearly identified student learning outcomes that lead to collegiate-level degrees, certificates, or credentials and include designators consistent with program content in recognized fields of study.

Programs are appropriate for a regional public institution and the current stated mission. Low enrollment has thinned course options and culled some majors. While there appears to be some disagreement about the effectiveness of the process for program review and potential sunsetting of programs in the past, the evaluation team found reasonable consensus that a collaborative and inclusive system is in place to assess program viability in the future. WOU also has clarified and differentiated what constitutes B.A and B.S degrees for undergraduate programs.

Student learning outcomes have been established and implemented for undergraduate degrees. WOU provided narrative examples of how assessments impact a selection of academic program. Additionally, the University's undergraduate learning outcomes have

articulated connections to the AAC&U's LEAP outcomes and NWCCU's recommended undergraduate learning outcomes.

vi. 1.C.2

1.C.2 The institution awards credit, degrees, certificates, or credentials for programs that are based upon student learning and learning outcomes that offer an appropriate breadth, depth, sequencing, and synthesis of learning.

Using a curriculum tracking systems, WOU collects course, program and graduate/undergraduate learning outcomes so that faculty can identify links between them and demonstrate how the learning outcomes scaffold from the course level to the degree level. The Vice Provost of Academic Effectiveness (VPAE) assesses the assessment program to seek opportunities to improve program assessment practices. WOU reports that 27 of 44 academic programs have culminating experiences such as a capstone or internship to facilitate a synthesis of learning as a culmination of a degree program.

Concern: The 2020 Report on Academic Effectiveness (more recent report not provided in Year 7 Report), as well as the reflections in the EIE narrative, suggest that the goal of using curriculum maps to clearly show alignment between courses and program learning outcomes is not widespread at WOU.

vii. 1.C.3

1.C.3 The institution identifies and publishes expected program and degree learning outcomes for all degrees, certificates, and credentials. Information on expected student learning outcomes for all courses is provided to enrolled students.

Western Oregon University publishes course learning outcomes in each course syllabus. Program learning outcomes are also published in the WOU Catalogue. Course learning outcomes, program learning outcomes and undergraduate/graduate learning outcomes all are published in the curriculum database.

viii. 1.C.4

1.C.4 The institution's admission and completion or graduation requirements are clearly defined, widely published, and easily accessible to students and the public.

Admissions requirements are posted and the process for enrollment is available in the catalogue, the public facing "Join our Pack" webpage and in the Admissions Viewbook (available both in print and electronic). There also are checklists and timelines available with specific steps for graduate, undergraduate, part time, first time, and transfer student once the application begins in WOU's application management system. Graduation requirements are published in the catalogue. Further requirements for majors, minors, and certificates are published through links on the academic program pages.

Undergraduates also use a four-year degree planner to track progress towards degree completion.

ix. 1.C.5

1.C.5 The institution engages in an effective system of assessment to evaluate the quality of learning in its programs. The institution recognizes the central role of faculty to establish curricula, assess student learning, and improve instructional programs.

Western Oregon University has established a process for regular assessment of learning in academic programs. At least one Undergraduate or Graduate learning outcome is embedded in each program. One program learning outcome is assessed annually and faculty engage in the data and report out to the appropriate dean and to the WOU Faculty Senate. Assessment information is incorporated into the seven-year program review cycle. All but two programs have submitted the most recent assessment data (as of the EIE report submission). Faculty are fully involved in the design, assessment and improvement of programs. They are supported by several University offices (Academic Effectiveness, Institutional Research and Academic Innovation). Moving forward, WOU is expanding ways of gathering data beyond student work samples, as well as assessing the quality of the assessment process itself.

x. 1.C.6

1.C.6 Consistent with its mission, the institution establishes and assesses, across all associate and bachelor level programs or within a General Education curriculum, institutional learning outcomes and/or core competencies. Examples of such learning outcomes and competencies include, but are not limited to, effective communication skills, global awareness, cultural sensitivity, scientific and quantitative reasoning, critical analysis and logical thinking, problem solving, and/or information literacy.

Western Oregon University faculty created General Education learning outcomes that align with a subset of AAC&U's LEAP and NWCCU undergraduate learning outcomes. They are actively being assessed and after a full cycle of assessment, they will be reviewed and revised as deemed necessary.

xi. 1.C.7

1.C.7 The institution uses the results of its assessment efforts to inform academic and learning-support planning and practices to continuously improve student learning outcomes.

Western Oregon University has integrated learning outcome assessment into its curricular development processes. Its curricular management system gathers information on the rationale for curriculum changes and records whether the curriculum change is driven by assessment data. WOU's program review includes annual assessment results in its process, which also results in curricular review. The evaluation team met with faculty program leads who confirmed the impact that assessment has on improving student learning outcomes.

Compliment: Academic programs have integrated learning outcome assessment across the curriculum.

xii. 1.C.8

1.C.8 Transfer credit and credit for prior learning is accepted according to clearly defined, widely published, and easily accessible policies that provide adequate safeguards to ensure academic quality. In accepting transfer credit, the receiving institution ensures that such credit accepted is appropriate for its programs and comparable in nature, content, academic rigor, and quality.

WOU has a policy on transfer credit and the degree of content alignment to accept a particular course. Using a Transfer Equivalency System, faculty make determinations on course equivalency. If there is no equivalency, the course may be accepted as general elective credit. For General Education courses, courses without a direct equivalency can be transferred if they meet the learning outcomes of a general education requirement. Equivalencies are reviewed annually. WOU accepts ACE Military credits and CLEP exams and challenge exams. Appropriate academic departments review prior learning credit portfolios.

xiii. 1.C.9

1.C.9 The institution's graduate programs are consistent with its mission, are in keeping with the expectations of its respective disciplines and professions, and are described through nomenclature that is appropriate to the levels of graduate and professional degrees offered. The graduate programs differ from undergraduate programs by requiring, among other things, greater: depth of study; demands on student intellectual or creative capacities; knowledge of the literature of the field; and ongoing student engagement in research, scholarship, creative expression, and/or relevant professional practice.

Western Oregon University's current mission (adopted in 2017) commits the institution to creating opportunities for student success and thus is consistent with the development of applied graduate programs that build, in some cases, on undergraduate programs (e.g., education). These programs typically result in the granting of an M.A, M.S. M.S.Ed., M.A.T. or Secondary Teaching Licensure, as well as graduate certificates. The evaluation team heard from multiple constituencies that professional graduate programs were important to the future of WOU. As part of that groundwork, faculty have created graduate learning outcomes, which specifically assess core content and applied skills, and thus differentiate graduate programs from the undergraduate curriculum. External review, program review and curricular review have been developed to insure rigor and depth for programs without professional accreditation. The institution has expressed an intent to develop graduate programs in the health sciences with a focus on the region's specific needs.

c. Standard 1.D: Student Achievement

i. 1.D.1

1.D.1 Consistent with its mission, the institution recruits and admits students with the potential to benefit from its educational programs. It orients students to ensure they understand the requirements related to their programs of study and receive timely, useful, and accurate information and advice about relevant academic requirements, including graduation and transfer policies.

At the undergraduate level, Western Oregon University admits a mix of first year, transfer, and post baccalaureate students. The Office of Admissions is responsible for WOU's admission decisions for undergraduates, and works closely with a number of other campus units including Financial Aid and Student Success, and Advising. The institution established an enrollment strategies team in 2021 that is focused on addressing barriers to recruitment, retention and graduation.

Graduate admissions are determined by each program. All graduate students must have a 3.0 undergraduate GPA for admission, although students with a 2.5-2.99 GPA may be admitted conditionally to a program.

Undergraduate and graduate students have an optional orientation during Welcome Week where they learn about the WOU catalog, requirements related to their programs of study, and they receive information and advice about academic requirements. The institution also has created an online orientation that may be accessed by first year and transfer student and includes information on transfer credits, placement, the WOU Portal, General Education and degree requirements. Additionally, the online orientation prompts students to apply for financial aid and prepares them to register for courses. Transfer students have an additional resource web page that consolidates information specific to their needs.

CONCERN: Although the institution is committed to equitable admission and orientation, high staff turnover has created gaps in knowledge that have created difficult conditions for making strategic decisions and may affect the institution's ability to serve its students.

ii. 1.D.2

1.D.2 Consistent with its mission and in the context of and in comparison with regional and national peer institutions, the institution establishes and shares widely a set of indicators for student achievement including, but not limited to, persistence, completion, retention, and postgraduation success. Such indicators of student achievement should be disaggregated by race, ethnicity, age, gender, socioeconomic status, first generation college student, and any other institutionally meaningful categories that may help promote student achievement and close barriers to academic excellence and success (equity gaps).

Western Oregon University has carefully identified a set of regional and national peers based on its institutional mission, campus size, program array, and student demographics. This peer group is benchmarked for retention and graduation rates. The institution disaggregates data by meaningful categories: sex, race/ethnicity (groups include white, Black, Hispanic, Asian, Pacific Islander, American Indian, two or more races, non-resident alien), Pell status, first-

generation status, rural high school, and veteran. These categories are shared on the institutional research website and are publicly available.

Compliment: The institution has carefully considered both the indicators of student success and the disaggregated data categories that are meaningful to them in order to analyze equity gaps.

iii. 1.D.3

1.D.3 The institution's disaggregated indicators of student achievement should be widely published and available on the institution's website. Such disaggregated indicators should be aligned with meaningful, institutionally identified indicators benchmarked against indicators for peer institutions at the regional and national levels and be used for continuous improvement to inform planning, decision making, and allocation of resources.

The institution publishes disaggregated indicators of student achievement on the Institutional Research Website. This includes disaggregated data on enrollment, retention, and graduation rates. Western Oregon University has used this data to address equity gaps and to drive curricular review and revision in majors and in general education. As part of this data driven analysis, the institution identified excess credits as a barrier to graduation and developed a streamlined curriculum to allow students to graduate in a timelier fashion. However, the institution has not yet benchmarked this student achievement against its peers.

Concern: While the institution has carefully selected its peers, it has not yet benchmarked student achievement data and made it publicly available.

Compliment: Western Oregon University has thoughtfully analyzed student equity gaps in its own data and has instituted meaningful interventions to promote equitable student success.

iv. 1.D.4

1.D.4 The institution's processes and methodologies for collecting and analyzing indicators of student achievement are transparent and are used to inform and implement strategies and allocate resources to mitigate perceived gaps in achievement and equity.

Western Oregon University collects and clearly identified its metrics for student achievement, and has articulated a transparent process for analyzing these metrics. The institution has developed a culture of disseminating and reviewing student achievement data across academic and student support divisions in order to develop interventions to close equity gaps. The institution has implemented an early alert system: the Wolf Connection System (WCS). Through this process, WOU has identified an several equity gaps and multiple student service resources have been deployed to mitigate these achievement gaps. Although the evaluation team did not observe a strategic plan for this

work, it was apparent that the institution is in the emerging stage of addressing equity and achievement gaps.

VI. Standard 2: Governance, Resources, and Capacity

d. Standard 2.E: Financial Resources

i. 2.E.2

2.E.2 Financial planning includes meaningful opportunities for participation by stakeholders and ensures appropriate available funds, realistic development of financial resources, and comprehensive risk management to ensure short term financial health and long-term financial stability and sustainability

The ability to ensure short term financial health and long-term financial stability is not readily apparent, yet the evaluation team recognized that the leadership and staff have invested considerable effort to develop improved planning models including the use of enrollment and student system data to better inform strategy and decisions.

WOU has implemented some steps to align expenses in response to the declining enrollment environment. The FY2022 financial statements indicated continuing pressure with a decline of 16% in student tuition and fees over the prior year corresponding to a continuing decline in enrollment and represents 46% of operating revenues. The revenue gains in FY2022 were in auxiliaries, grants, and state appropriations. As auxiliaries are largely dependent on enrollment, this presents a continuing net operating revenue risk. The loss before non-operating revenues showed improvement, moving from -\$3.47M to -\$.9M.

As noted in the institution's response to the PRFR finding, WOU implemented an enrollment projection model to improve revenue estimation to influence budget planning, including reduction strategies. The evaluation team noted that this enrollment modeling and use of for planning purposes continues to be in its early stage. The university is under tremendous pressure to balance its budget on an annual basis while maintaining policy level reserves of 5-15%. Fall 2022 enrollment continued to decline with a decrease in undergraduate enrollment of 8.2% mildly offset by an increase in graduate enrollment of 4.3% resulting in an overall decline of 6.9%.

The institution's EIE report included reference of a student to faculty ratio of 12:1. University staff indicated that ratio has moved to approximately 13:1 due to the reduction in parttime faculty along with faculty vacancies that have not been refilled

Concern: Enrollment models and expenses do not appear to be aligned. The Fall 2022 decline adds to the enrollment declines over the past 10 years. The evaluation team did not observe a current enrollment management plan. The evaluation team is concerned that the student to faculty ratio is not fiscally sustainable and is a risk factor contributing to short term financial health.

e. Standard 2.F: Human Resources

i. 2.F.3

2.F.3 Consistent with its mission, programs, and services, the institution employs faculty, staff, and administrators sufficient in role, number, and qualifications to achieve its organizational responsibilities, educational objectives, establish and oversee academic policies, and ensure the integrity and continuity of its academic programs.

The University has experienced substantial turnover due to retirements, reductions in personnel and employees pursuing other opportunities. This environment, along with the move from a system governance model where services were provided at the state level to an independently governed public institution, has increased risk as the institution became more dependent on its own professional staff to complete the necessary work. The evaluation team did not observe that the institution was evaluating professional staffing levels and expectations to ensure the university conducts it work in a best practices or industry standard model where possible given resources. The evaluation team did not observe that technology platforms were being fully utilized, to optimize and promote efficiency in business practices. While the university has invested in technology platforms, the evaluation team was unable to discern whether staff has had adequate training on these tools. An increased focus on metrics, dashboards, data visualizations will provide leadership and governance with more opportunities to use data to inform decisions as appropriate. These together will better situate the university to engage in solid and sustainable long-term planning related to academic programs, financial planning and sustainability, and student services.

Concern: High staff turnover and staff reductions have increased the risk that key functions of the university cannot be achieved.

VII. Summary

Western Oregon University, like many other regional comprehensive universities across the country, faces significant financial challenges due to the shifting enrollment patterns and the decrease in state support. The change in Oregon's governance of state institutions has put increased pressure on this institution. WOU has a mission centered focus, and its commitment to student success is commendable. For example, the institution has done exemplary work in closing equity gaps and helping students get to graduation with a minimum of excess credits. However, this mission is threatened by both the financial issues it faces and its staffing patterns.

VIII. Commendations and Recommendations

a. Commendations

. Commendation 1:

The peer evaluation team commends the commitment of the faculty, staff and administration to Western Oregon University's mission as evidenced by the connection that faculty, staff and administrators have to the institution and their dedication to cooperation and collaboration to support student success, even in the face of multiple institutional challenges.

i. Commendation 2:

The peer evaluation team commends the institution's use of data to improve student achievement. In particular, the curricular alignment project enables students to streamline their path to graduation. This project illustrates the Institution's commitment to equitable student success and was recognized with the NWCCU Beacon Award in 2022

b. Recommendations (each recommendation must reference one or more standards)

i. Recommendation 1:

The peer evaluation team recommends further development and the systematic use of effective enrollment, financial planning and financial management practices to ensure realistic development of financial resources to ensure short term financial health and long-term financial stability and sustainability. (2.E.2)

ii. Recommendation 2:

The peer evaluation team recommends that the institution deploy current higher education best practices, including the effective use of technology, to ensure attainment of industry standard practices to achieve its organizational responsibilities and the integrity and continuity of its educational programs. (2. F.3)