230 South LaSalle Street, Suite 7-500 | Chicago, IL 60604-1411 312-263-0456 | 800-621-7440 | Fax: 312-263-7462 | ncahlc.org

## ANALYSIS OF NON-FINANCIAL REPORT IN CONJUNCTION WITH CHANGE OF CONTROL REVIEW DATE: May 8, 2013

PARTICIPANTS: Barbara Gayle, David Wantz, Karen Solinski, Robert Appleson

INSTITUTION: Tiffin University, Tiffin, OH

**EXECUTIVE OFFICER: Dr. Paul Marion** 

PREVIOUS COMMISSION ACTION RE: REPORT (If applicable): NA

<u>ITEMS ADDRESSED IN REPORT:</u> The Commission received the institution's report on the above topic on July 25, 2012 related to the following indicators (designated by "X"):

X1. Increase or decrease in enrollment (+/- 25% or more) from prior reporting year
2. Increase or decrease in degrees awarded (+/- 40% or more) from prior reporting year
☐3. Increase or decrease in full-time faculty (+/- 25% or more) from prior reporting year
4. 3-yr. student loan default rate (25% or more) in the period reported
☐ 5. Ratio of full-time faculty to degree programs (less than 1) in the period reported
$\square$ 6. Ratio of undergraduate FTE students to undergraduate FTE faculty (greater than 35) in the period reported

X 7. Ratio of undergraduate FTE students to undergraduate degrees awarded (highest 3% of 4-year institutions)

<u>TEAM ANALYSIS</u>: In its report of July 25, 2012, Tiffin University attributed its 38% headcount enrollment growth from fall 2010 (4940) to fall 2011 (6816) primarily to new online enrollment at the associate level delivered through Ivy Bridge College (IBC) of Tiffin University. Tiffin describes IBC as a joint venture operated with a non-accredited organization, Altius Education, based in California. IBC is housed in a facility located in greater Toledo about an hour from Tiffin's main campus in Tiffin, OH. The formal corporate name of IBC is now Altius University.

The 38% increase in Tiffin's headcount is what triggered Indicator 1 above. As for Indicator 7 above, Tiffin stated that "many of the students have started their programs within the past 12-24 months and many are enrolled part-time." Tiffin explained that as a consequence of this recent enrollment, "many of the students are not expected to graduate for another year or two." In other words, the numerator of undergraduate FTE in Indicator 7 would be increasing without a corresponding increase in the denominator of degrees awarded. This would cause the ratio to be higher than otherwise, thus causing the indicator to trigger.

While the statements in the Tiffin response seemed correct, the Commission determined that more inquiry was warranted because the explanation provided no specific evidence of a reasonable level of retention. Thus, the Commission directed that the Change of Control Visit on March 11-12, 2013, look into this matter further. In a conference at the beginning of the visit, the team inquired of seven Tiffin Board members

(two in-person, and five by telephone) whether there had been any Board discussion of goals for improving retention or default rates, and the team learned there had not been—though the Board members said they hoped these rates would improve. Shortly after that conference, when two team members asked the Vice President for Academic Affairs for the most recent retention rate at IBC, he gave a rough range and said he would get the most recent data according to the team's specifications. These data were provided a bit later in the visit (Attachment A). While the VPAA is generally aware of the low rate of retention, he indicated that, regarding IBC, he focuses more as the chief academic officer on insuring that faculty members are properly qualified and that Tiffin's academic policies are being followed.

Attachment A shows the number of fall 2011 enrollees who were still enrolled for fall 2012. Because there are two seven-week terms at IBC within the fall semester, the data included enrollees in either term during the fall semester. The team specified this feature of the data so as not to understate IBC's student success in light of the "stop out" phenomenon cited by Tiffin. Specifically, this feature counts as retained those students who stop out for a term but who return the following term. Of the 3111 degree-seeking students enrolled in fall 2011, 930 (30%) persisted to fall 2012. Of the 3111, 1443 were newly enrolled in fall 2011, and 360 (25%) of these new newly enrolled students persisted to fall 2012. Although 2-year institutions typically record substantially lower rates of retention than do 4-year institutions, the retention rates at IBC are notably poor even for 2-year institutions. In contrast, the retention rate for the same period for degree-seeking bachelor's business students at Tiffin was 64%, which is typical of non-selective 4-year institutions.

Two team members raised the matter of the IBC retention rates with a group of about a dozen faculty members on the main Tiffin campus, of which two reported having had direct experience with IBC courses. Though not sure of the actual IBC retention rates, the faculty indicated that retention had been worse earlier and had raised concerns. However, the faculty said they were satisfied by the current levels. In response to questions from the team members, the faculty said they have not set specific goals for improvement of the rates. Several stated that, as long as the rates are improving, that condition should be acceptable. Repeated attempts to get the faculty to say what an appropriate retention rate would be were not successful, and one faculty member argued that trying to set such an objective could lead to grade inflation. Another stated that a low retention rate should be expected and tolerated because everyone deserves a chance. The team members also tried to get the main campus faculty members to discuss their interaction with faculty at IBC, in part to understand the level of main campus involvement in student success at IBC. The chief response was that faculty members at IBC attend faculty meetings on the Tiffin campus and must submit curricular changes and matters of tenure and promotion for review and approval. There was little sign of any systematic attention by main campus faculty to student success at IBC.

On the second day of the visit, the team interviewed personnel at the IBC facility. These interviews made clear that faculty members at IBC are involved almost solely with instruction, with responsibility for other key student success factors charged to others at IBC. In particular, Ivy Bridge provides coaches and tutors for its students, though tutors are not as available for courses beyond entry-level. The team found a concerted effort to schedule these individuals to maintain coverage throughout the day and to maintain a reasonable response time. The team also learned about a College Readiness Assessment that is being used in conjunction with placement, but it was not clear how effective this assessment has proven. A teleconference with roughly 20 current IBC students showed satisfaction with IBC, especially regarding the role of the coaches. The team did not talk with students who had not persisted. The team saw no projections of retention rates improving into the future according to the team's fall-to-fall format or according to some other format.

Even with the concerted effort of coaches and tutors, the retention rates are very low, for which the Vice President for Student Engagement (an Altius University employee) noted the difficulty of retaining a typical mature student trying to balance the demands of family and work. When asked about low retention at IBC, the Vice President for Enrollment Operations (also an Altius University employee) attributed part of the problem to fraud perpetrated on IBC by people posing as students in order to claim federal financial aid. With no intentions

of completing courses, these people would contribute to a low retention rate. She reported further that since identifying the origins of such fraud (through recurrent area codes), IBC has been able to reduce this problem. Still, even with material reduction of such fraud, IBC retention remains low. The Vice President for Enrollment Operations also said the requirement that applicants now submit high school transcripts should be expected to improve retention rates in the future by making it more inconvenient to game IBC admissions. When asked about other planned measures that might be taken to improve retention, she offered none.

Interviews with roughly a dozen full-time faculty members at IBC indicated that they carefully follow the curriculum of Tiffin in their online instruction. (These faculty members receive their salary payments from Tiffin, but the money comes from Altius to Tiffin earmarked for the salary payments.) A team member found that the content of the several online courses she visited was very thin, which may play a role in the low IBC retention rates, especially given the challenge of accelerated learning coupled with non-selective admissions. (This content was not compared with that for seated semester-long courses on the Tiffin campus, where the retention rates are higher.) The faculty members at IBC mirrored the response of the main campus faculty in terms of their mutual interactions. One Ivy Bridge faculty member said he might consult a main campus faculty member if he had a question about test content.

Toward the end of the visit, the team interviewed the CEO of Altius Education, who, along with the president of Tiffin University and others, sits on the Altius University Board of Managers. The Altius Education CEO was asked for a goal of retention of new students and finally provided a figure of 35% for fall-to-fall retention, which the team regards as markedly insufficient. He also reinforced the idea that an operation like IBC has the potential to do a better job than community colleges (which have many other functions) in providing instruction for the Associate of Arts that can be transferred towards a four-year degree. Yet he was unable to explain why more Tiffin degree programs (including programs at the baccalaureate and Masters level) are now being transferred to IBC in apparent conflict with the idea of IBC focusing on the Associate of Arts. This conflict is even more troubling because of the poor performance at IBC in student success and because the original review of IBC by the Commission in 2010 assumed the then-stated AA focus, which was authorized by the Ohio Board of Regents. It should be noted that the Commission's approval of online delivery at that time does not set aside the expectation that Tiffin demonstrate an adequate level of student success.

In summary, the team finds that the IBC operation, which accounts for more than 40% of Tiffin's enrollment, does not meet Core Component 4.C of the Criteria for Accreditation:

The institution demonstrates a commitment to educational improvement through ongoing attention to retention, persistence, and completion rates in its degree and certificate programs.

In particular, the team observed no substantial monitoring of or responsibility for retention at IBC by the Vice President for Academic Affairs, the faculty on the main campus, or the faculty at IBC. Those personnel at IBC who do seem to monitor retention seem inclined to justify the low retention rate on grounds that eliminate any institutional accountability. In addition, no substantial steps are being taken that would be expected to raise the retention rate to an acceptable level. Finally, the Altius Education CEO sets only an inadequate objective for retention of new students at IBC for the future, while even more Tiffin programs on the main campus are being moved to IBC.

The finding that Core Component 4.C is not met carries no recommendation as part of the present analysis, though a finding that a Core Component is not met could be expected to result in a recommendation for at least a sanction. Rather, the present analysis will be referenced in the Staff Summary Report of the Change of Control visit, which will take up a number of other issues. The present analysis is being provided with Staff Summary Report as a separate attached document in line with the Commission's policies and procedures on Non-Financial Indicators.

When the institution receives the draft visit report, it will be asked to identify any errors of fact at the time, and it will be invited to submit a broader response to the report.