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PRESIDENT

Mary Ellen Petrisko

July 8, 2016

Father Gladstone Stevens, S.S.
President and Rector
St. Patrick's Seminary and University
320 Middlefield Road
Menlo Park, CA 94025-3596

Dear President Stevens:

This letter serves as formal notification and official record of action taken concerning St. Patrick's Seminary and University (SPSU) by the WASC Senior College and University Commission (WSCUC) at its meeting June 22-24, 2016. This action was taken after consideration of the report of the review team that conducted the Special Visit to SPSU March 2-4, 2016. The Commission also reviewed the institutional report and exhibits submitted by SPSU prior to the Special Visit and the institution's May 27, 2016 response to the team report. The Commission appreciated the opportunity to discuss the visit with you and ALO Jon Kirwan. Your comments were very helpful in informing the Commission's deliberations. The date of this action constitutes the effective date of the institution's new status with WSCUC.

Actions

1. Receive the Special Visit team report that focused on:
 - a. Strategic Planning
 - b. Assessment
 - c. Program Review
 - d. Cultural Competence
 - e. Organizational Structure
 - f. Technological Infrastructure
2. Continue the Formal Notice of Concern
3. Schedule a Special Visit in spring 2018 to address:
 - a. Strategic Planning
 - i. Completing those goals and objectives with deadlines of December 2017 or earlier
 - ii. Working toward achieving a sustainable enrollment
 - iii. Establishing a realistic development plan
 - b. Educational Effectiveness
 - i. Designing assessment tools for department- or program-level outcomes that measure whether students have achieved competency on the outcomes
 - ii. Aligning course-level and program-level outcomes with SPSU's mission and vision

- iii. Adhering to the established schedule for program review
- iv. Developing a template for the program review self-study
- v. Improving the annual evaluation of students by making the process more consistent and transparent
- c. Cultural Competency
 - i. Defining and assessing the attitudes or skills needed by seminarians to serve “the Roman Catholic Church in the ministerial context of the Pacific Region”
 - ii. Identifying where in the curriculum, the co-curriculum, and pastoral year seminarians receive training in these attitudes or skills
- d. Organizational Structure
 - i. Delegating authority to administrative leaders to enact changes in their areas of responsibility
 - ii. Designing clear communication and transparent decision-making processes

Commendations

The team commended St. Patrick's Seminary and University for the following:

1. Demonstrating integrity, transparency and openness throughout the review process. The institutional report was honest and candid. All those who were interviewed during the visit, as described by the team, were forthcoming and straightforward in sharing their experiences.
2. Making considerable progress in a short period of time in the area of program review. The institution completed a full cycle of review for one program and articulated clear next steps in the process, including developing systematic procedures, and a schedule for additional reviews.
3. Making considerable progress in a short period of time in the area of assessment. SPSU developed or revised its course learning outcomes, began to align them with department outcomes, and operationalized outcomes so that they are now observable and measureable.
4. Improving its technological infrastructure and support as well as implementing new and upgraded software systems. SPSU adopted the Populi cloud-based college management system; the library is transitioning to an electronic catalogue and has upgraded its databases to enhance access to scholarly and other digital publications; and the institution has made a concerted effort to improve Wi-Fi and technical support services through an external vendor.
5. Investing considerable time and energy in faculty development. Of particular note is the training that has taken place in the areas of assessment and the new Populi system. The 18-month faculty development program has advanced the institution's knowledge of the importance of assessment.

6. Revamping its organizational structure and adding dedicated, experientially diverse and qualified employees.

Recommendations

Despite the team's commendations, the Commission is deeply concerned that the university is in danger of being in non-compliance with the Standards. Turnover in faculty, staff, and administrators has led to questions about the institution's ability to sustain itself and about the role of the governing board in ensuring the viability of St. Patrick's Seminary and University. At the time of the spring 2018 Special Visit, the Commission expects the university to demonstrate strengthened compliance with the Standards by providing evidence that it has addressed the following:

1. Strategic planning. Continue to work on the strategic plan to accomplish the goals and objectives by the deadlines identified. In particular, St. Patrick's Seminary and University needs to develop strategies that will result in sustainable enrollment and that will generate revenue to ensure the institution's financial viability. (CFRs 3.4, 4.1, 4.5, 4.6)
2. Assessment. Move to the next level of institutional engagement in assessment by designing multiple methods of assessment for each department and/or program-level outcome, consistently aligning course outcomes with program outcomes and with mission and vision, and creating assessment tools that accurately determine if competence has been achieved. (CFRs 2.3, 2.4, 2.6, 4.3)
3. Evaluation of seminarians. Strengthen and improve the annual evaluation of students, making the process consistent, clear, and transparent. (CFRs 2.3, 2.4, 2.6)
4. Program review. Build upon the steps taken to articulate a coherent and meaningful program review process by adhering to the program review schedule, developing a template or standardized set of questions for the program review self-study, and integrating program review findings into budgeting and strategic planning. The Commission appreciated learning that another program review is now completed and a third is slated to begin in the fall. (CFRs 2.7, 4.3, 4.4)
5. Cultural competence. Articulate and formalize efforts to develop the cultural competence of the seminarians throughout their holistic academic, co-curricular, and pastoral formation phases. Specifically, the institution is expected to define and assess the attitudes or skills needed by seminarians to serve effectively "the Roman Catholic Church in the ministerial context of the Pacific Region" and to align the institution's educational programs with this vision. (CFRs 1.4, 2.3)
6. Organizational operations. Improve upon the new organizational structure by empowering administrative leaders to enact change in their areas of responsibility

and by designing clear communication and transparent decision-making processes. (CFRs 3.2, 3.6, 3.7)

A Formal Notice of Concern provides notice to the institution that, while it currently meets WSCUC Standards, it is in danger of being found in non-compliance with one or more Standards if current trends or findings continue. If the issues are not addressed within four years from the time of the original Formal Notice of Concern (which was July 2014), a sanction could be imposed as described in the 2013 *Handbook of Accreditation*.

In accordance with Commission policy, a copy of this letter will be sent to the chair of St. Patrick's Seminary and University governing board in one week. The Commission expects that the team report and this action letter will be posted in a readily accessible location on the SPSU website and widely distributed throughout the institution to promote further engagement and improvement and to support the institution's response to the specific issues identified in these documents. The team report and the Commission's action letter will also be posted on the WSCUC website. If the institution wishes to respond to the Commission action on its own website, WSCUC will post a link to that response on the WSCUC website.

Finally, the Commission wishes to express its appreciation for the extensive work that St. Patrick's Seminary and University undertook in preparing for and supporting this review. WSCUC is committed to an accreditation process that adds value to institutions while contributing to public accountability, and we thank you for your continued support of this process. Please contact me if you have any questions about this letter or the action of the Commission.

Sincerely,



Mary Ellen Petrisko
President

MEP/ bgd

Cc: William Ladusaw, Commission Chair
Jon Kirwan, ALO
Archbishop Salvatore Cordileone, Board Chair
Members of the Special Visit team
Barbara Gross Davis, Vice President

REPORT OF THE WSCUC TEAM
SPECIAL VISIT

To St. Patrick's Seminary and University

March 2-4, 2016

Team Roster:

Team Chair - Mark Bookman, Professor, Business and Law American Jewish University

Team Assistant Chair - Stephanie Juillerat, Associate Provost, Azusa Pacific University

Team Member - Carol Ann Gittens, Interim Dean, School of Education and Counseling
Psychology, Santa Clara University

Staff Liaison - Barbara Gross Davis, Vice President, WSCUC

The team evaluated the institution under the 2013 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.

TABLE OF CONTENTS

	Page Number
SECTION I – OVERVIEW AND CONTEXT.....	3
A. Description of the Institution, Accreditation History, and Visit	
B. Description of the Team’s Review Process	
C. Quality of the Institution’s Special Visit Report: Quality, Rigor and Supporting Evidence	
SECTION II – TEAM’S EVALUATION OF ISSUES UNDER THE STANDARDS.....	5
A. Strategic Planning.....	5
B. Assessment.....	8
C. Program Review.....	11
D. Cultural Competence.....	13
E. Organizational Structure.....	15
F. Technological Infrastructure.....	19
SECTION III – OTHER TOPICS.....	21
SECTION IV – COMMENDATIONS AND RECOMMENDATIONS	23

SECTION I – OVERVIEW AND CONTEXT

A. Description of the Institution, Accreditation History, and Visit

St. Patrick's Seminary and University (SPSU), owned by the Archdiocese of San Francisco and under the local direction of the Priests of the Society of Saint Sulpice, is located in Menlo Park, CA and was incorporated according to the laws of the State of California in 1891. SPSU is primarily a graduate level Theologate, preparing men for ordained ministry. The institution also offers a non-degree "pre-theology" program for men already possessing a bachelor's degree in a field other than philosophy and an undergraduate degree completion program in philosophy that prepares students to enter the Master of Divinity or Master of Arts programs at SPSU. The seminary has about thirty faculty split fairly evenly between full and part time members and while it has historically served just over 100 students, current enrollment is closer to 67, only a few of whom are undergraduates.

SPSU was granted initial accreditation in June 1971. Although the institution has been continuously accredited for more than 30 years, the themes of past visits and interim reports have consistently focused on planning, financial sustainability, assessment, and program review.

SPSU began its most recent reaffirmation process in spring 2012 under the 2008 WSCUC institutional review process. The institutional Capacity and Preparatory Review (CPR) report in spring 2012 focused on issues related to assessment and student learning, as well as how to marshal and deploy faculty and institutional resources to enhance, strengthen, and improve student learning. The CPR team identified a number of areas that still needed attention, including development and execution of a robust assessment model; articulation of expected learning outcomes and methods of measuring student achievement; attention to retention and graduation rates; enhanced strategic and fiscal planning processes; alignment of board governance with WSCUC policy on independent governing boards; and compliance with WSCUC policy on credit hours. The institution was urged to escalate its focus and attention on issues related to assessment of educational effectiveness throughout the institution in order to demonstrate adequate progress by the time of the Educational Effectiveness Review (EER).

In spring 2014 the EER team concluded that SPSU was still in the process of building the mechanisms and infrastructure that would allow it to demonstrate and sustain educational effectiveness. As a result of the EER visit, the Commission

acted to receive the Educational Effectiveness Review report and reaffirm accreditation of St. Patrick's Seminary and University for seven years, schedule the Mid-Cycle Review for spring 2018, the Offsite Review for fall 2020, and the Accreditation Visit for spring 2021. Additionally, at its June 2014 meeting, the Commission issued a Formal Notice of Concern with regard to six areas (strategic planning, program review, assessment, cultural competence, organizational structure, and technological infrastructure) and required a Special Visit in spring 2016 to determine the degree to which the areas were adequately addressed and if the Notice of Concern could be removed. The institution was notified that if issues identified in the Notice of Concern were not successfully addressed within four years (by spring 2018), a sanction could be imposed.

SPSU compiled an institutional report addressing all six areas, and a visit was scheduled and conducted March 2-4, 2016.

B. Description of Team's Review Process

The team received the institution's report in January 2016, followed by a steady stream of supplemental material right up until the time of the visit on March 2. Although the institution was responsive to requests for materials, the asynchronous manner in which they were received made the review process less cohesive than desired. It also raised some concern that the institution was engaging "in the moment" to craft its response.

Each WSCUC team member was assigned specific foci from the six key areas; however, the entire team participated in the majority of interviews during the visit.

C. Institution's Special Visit Report: Quality and Rigor of the Report and Supporting Evidence

The report provided by SPSU was organized around the six key areas and adequately addressed the actions taken by the institution from the time the Notice of Concern was issued to the March 2016 site visit. While the narrative section of the report was sufficient in addressing the areas, as noted earlier, the production of supplemental materials was piecemeal and epitomized what one SPSU employee characterized in an interview as "moving on the fly." This theme also permeated the interviews during the visit, illustrating that SPSU is still building necessary infrastructure to be able to demonstrate educational effectiveness.

The institution's report, written primarily by the five member Institutional Effectiveness Committee (IEC), as well as the in-person interviews, reflected a very candid and authentic portrayal of the institutional neglect and resistance it has experienced historically, in particular to assessment and program review. The review team appreciated the integrity of the institution to recognize that it was "not where it needed to be" in the areas of assessment and program review. In effect, SPSU indicated it was playing catch-up at warp speed, which was evident in the report, the supplemental evidence, and the interviews.

SECTION II – TEAM'S EVALUATION OF ISSUES UNDER THE STANDARDS

A. Issue: Strategic Planning (CFRs 4.1, 4.2, 4.5, 4.6)

In 2014 SPSU presented a strategic plan, which was an extensive list of tasks without prioritization and focus. The Commission letter of July 7, 2014 stated:

The Commission expects SPSU to develop a detailed action plan for implementation that includes refined timelines, required resources, identified lines of responsibility, and clear, specific, observable measures for determining when milestones are achieved. The Commission further expects SPSU to make systematic progress on its identified strategic priorities. (CFRs 3.5, 4.1-4.3)

This broad charge to SPSU was further extended to include:

In particular, SPSU will want to tie the results of assessment and program review to its budgeting process and to align strategic planning, assessment, and allocation of resources in order to accomplish its institutional goals."(CFRs 2.3, 2.6, 2.7, 3.4, 4.4, 4.6)

In June 2014, a new president/rector was appointed at SPSU. Key players to undertake the work of strategic planning and other actions were gradually added with the new team not fully in place until summer 2015. With a relatively narrow timeline, essentially the same cadre of individuals developed a revised mission and vision statement, worked through developing goals and objectives for the strategic plan, engaged in significant developments in assessment and program review, began implementing training on assessment, and is now working to merge these efforts into a comprehensive five-year financial plan.

The 2016-2019 strategic plan was approved by the Board of Trustees in February 2016. Since the plan had just begun at the time of the visit, there was no objective basis on which to evaluate if the institution will achieve its stated outcomes. Yet from the team's site visit, it was clear there had been significant engagement across the institution in each component of the strategic plan, that much had been accomplished in the relatively short time since the new leadership team had been put in place, and that SPSU was committed to meeting the due dates set in the strategic plan, as well as those in the multi-year program review schedule.

Prior to working on the strategic plan, at the request of the department chairs and faculty, SPSU engaged in a highly interactive effort through which a new mission and vision statements were developed. The impetus for this was the recognition that until there was agreement as to this institution's mission, it would be impossible to engage in a comprehensive program review effort or to develop institutional learning outcomes. The team's review of the support material as to the process followed in developing the new mission and vision statements demonstrated a thoughtful, interactive, inclusive, and reasonably well-researched effort. In revising the mission and vision statement, SPSU made a serious effort to address WSCUC and Association of Theological Schools (ATS) concerns, used what data they had, did a Strengths/Weaknesses/Opportunities/Threats (SWOT) analysis, and involved faculty, administrators, students (through surveys done for other purposes) and the Board of Trustees.

One of the advantages of a new senior management team, as well as multiple new faculty, is the ability to forthrightly address areas of significant concern. In the introductory material to the strategic plan, SPSU states:

In the next three years, SPSU must focus its efforts at increasing enrollment, creating a development plan for institutional viability, and analyzing the intellectual, human, and spiritual dimensions of formation in order to re-integrate all dimensions of formation through pastoral formation. These fundamental issues must be addressed before SPSU can engage in longer-term planning.

In the introductory material of the written report, SPSU also addressed the impact of its significant faculty turnover: "the majority of these faculty members have served SPSU for fewer than five years, there is nonetheless a lack of integration of formation practices at SPSU." The president/rector and vice rector/academic dean recognized the importance of faculty continuity and are identifying strategies by which they can gain longer commitments from the dioceses and orders which make faculty available to SPSU.

Despite these challenges, SPSU set out goals and objectives for six areas in its strategic plan: academic excellence, sustainable enrollment, coordinated human and spiritual formation, pastoral integration, organizational stability, and a robust development (department). The team believed there was a conscious effort to set forth a plan that was “doable” within the institution’s human and financial resources. A strength of this strategic plan is that it does assign due dates and an individual and/or committee that is accountable for each enumerated objective. There is also an effort to identify the cost to accomplish each objective, as well as information as to whether or not the effort is currently funded or will be included in SPSU’s five-year financial plan. Key to SPSU’s financial planning is the reconstitution of a private giving program, which can fund needed deferred maintenance and other capital projects.

With a number of the goals and subordinate objectives, the planned progression is very much on target. It should be noted, however, that some of the objectives under the goals seem to only partially address what is needed for a successful outcome.

For example, the third objective under the goal of academic excellence (to recruit and retain qualified applicants for open positions) has two somewhat standard sub-objectives: advertise open positions through professional associations, and develop a small pool of qualified part-time faculty for each department. While these sub-objectives are certainly appropriate, they do not seem to address the nature of the hurdles SPSU has in identifying and retaining faculty (e.g., bishops re-assigning clergy to other roles; the cost of living in Menlo Park).

As another example, the sixth goal of the strategic plan addresses the need to have a successful development effort. At the time of the visit, SPSU had no development staff nor substantive development plan. It would seem the first effort needs to be to determine the totality of what SPSU believes it needs from a development effort including: striving to measure if this aligns with what similar institutions have been able to accomplish, determining the timeline for completing this initial analysis, hiring a development director, building a private giving plan, creating the needed database to identify potential donors, identifying the probable timeline before the development effort will break even, generating net revenue, etc. Without these strategic sub-goals (objectives), it will be very difficult to stay on track for the overarching goal of a successful development effort.

While the team identified areas in the strategic plan needing elaboration, it should be noted that the SPSU staff members and members of the board were also well-aware

that what they have set forth as objectives is not all that needs to be accomplished. These individuals understand that implementing a new development plan will be a multi-year effort before real gains will be seen. Similarly, in the areas of assessment and program review, SPSU has a far more robust work plan and effort underway than the enumerated milestones indicates.

Findings. SPSU did not begin working in earnest on the development of its strategic plan until summer 2015. The board approved the plan in February 2016. Under a relatively short time frame, SPSU was able to revise its mission and vision statements, engage stakeholders in identifying key goals for the next three years, and specify objectives and target dates under each goal. While some aspects of the strategic plan need further development and attention, the team concluded that SPSU now has an administrative team and set of department chairs that have the capacity to do the needed work to enact the strategic plan and generate tangible results.

B. Issue: Assessment (CFRs 2.3, 2.4, 2.6, 4.3)

In its institutional report, SPSU readily acknowledged its historical lack of systematic assessment. The institution's report identified several obstacles to building a culture of assessment, most notably a significant number of academic personnel transitions, especially in the position of ALO, as well as a general reluctance on the part of the faculty to see the value of assessment. Interviews with various members at SPSU confirmed that there was an extraordinary amount of pushback and resistance to overcome.

According to SPSU's report, once the institution appointed an interim ALO, it began making significant strides toward "correcting the institutional neglect of the preceding fifteen years." Indeed, the hiring of a permanent ALO in July 2015, as well as the establishment of the Institutional Effectiveness Committee, further advanced the institution. According to the report, efforts to institutionalize assessment began at the micro level by using groups of faculty and administrators who were already committed to assessment (e.g., department chairs, ALO, academic dean) and then spread to the faculty at large via a series of faculty development offerings that began in 2015 and continue today.

The team interviewed the Institutional Effectiveness Committee, Program Review Committee, department chairs, and faculty, and all groups affirmed the significant progress that SPSU has made, as well as a new-found understanding and appreciation of the importance and relevance of assessment. As stated by one

faculty member, “curriculum mapping suddenly makes sense.” This new-found understanding is a result of strategic education (CFR 3.3). According to the institutional report, as well as in subsequent interviews, faculty have been resourced through a faculty development series that was initiated in fall 2015, and all indications suggest that the development series will continue. A discussion with the full faculty illustrated a seemingly unified endorsement of the education they had received and a recognition that they had more to learn.

In terms of enacting assessment strategies, department chairs continue to lead the way. Interviews with the Program Review Committee (made up of department chairs) validated that chairs were the initial implementers of assessment tasks, and they continue to assist faculty by reviewing faculty syllabi for continuity between learning outcomes and assignments, while also taking most of the responsibility for writing and shepherding program review. Chairs also meet together regularly and work collaboratively to monitor the program review process. The team was able to confirm the strong level of commitment across all constituents to building a culture of assessment.

Although commitment levels were high, several key employees at SPSU characterized the institution as “emerging” in the area of assessment. A review of the assessment materials provided by the institution confirmed that SPSU is in the beginning stages of material development related to assessment. Materials reviewed by the team included syllabi, annual reports, samples of course assignments and rubrics, assessment of program learning outcomes, and curriculum maps, as well as the annual evaluation of students that invokes the four pillars of priestly formation.

Based on this review of materials and subsequent interviews, the team concluded that most of the course level assessments submitted for review seem to be measuring knowledge of course content through exams or papers and were, effectively, grading rubrics. Basic grammar and writing were also assessed via exams and a writing sample. There seemed to be very few higher order learning outcomes that were visibly assessed (e.g., critical thinking, analysis, synthesis).

At the program level, materials were provided for two departments that had developed department learning outcomes that were mapped to the courses offered. As mentioned previously, the program-level assessments that were provided for review were often scores from knowledge-based exams, or a score that was re-constructed into a category. For example, the comprehensive oral exam rubric, while holistic in nature, seemed to utilize a single categorical representation (excellent,

good, fair) for what should be a rather complex set of skills displayed by a student. Other assessments the team reviewed more comprehensively assessed student knowledge of key concepts, but mostly by virtue of a written exam. In general, the SPSU rubrics that were reviewed lacked sophistication.

In most cases, a program learning outcome was not clearly triangulated by another source of evidence. The exception was Pre-Theology, which utilized both direct and indirect (student perception) measures, deriving data from students and faculty, and including a pre-post analysis of some data sources. While committed to data collection and analysis, the Pre-Theology Department is still building a comprehensive annual assessment plan. Notably, some program learning outcomes seemed to lack an assessment tool [e.g., the student will exhibit the ability to analyze, synthesize, and contextualize, showing critical thinking and writing skills. (PPF, par. 162) (Intellectual Pillar)], and interviews with Pre-Theology faculty confirmed that the assessment tools were still being designed. Currently, this department seems to be the exception; otherwise, the assessment strategies lacked the appropriate complexity, often relying on one assessment tool to measure multi-faceted elements of student learning.

On the student life side, the team reviewed the primary instrument used by faculty to evaluate student progress on the four pillars of priestly formation. The tool is a collection of narrative comments from a formation faculty member, or Formator, designed to provide feedback about student readiness to move to the next level of education. Interviews with the Dean of Men indicated that one formation faculty was responsible for collecting evidence and submitting the narrative, but that a group of faculty provided insight based on personal experiences and, ultimately, voted on the outcome for the student. The assessment process also utilized a self-reflection from the student, as well as an assessment from a field education supervisor. Interviews with students indicated some element of confusion and anxiety with this process, namely because of the variability of the process across Formator, the turnover in faculty that resulted in a change of evaluator on a fairly regular basis, and the lack of criteria or guidance for what constituted success. Some students suggested that the process was driven more by the quality of the individual relationship with the Formator than by the achievement of any criteria, and some felt that a casual encounter in the hallway with a faculty member who was not their Formator could produce an anecdotal piece of evidence that worked significantly against them. The team noted the seeming lack of standardization and consistency in such a high-stakes assessment process and recommends the institution implement relevant assessment practices such as articulating clear expectations and criteria for each pillar, some element of scoring or evaluative rating, and a system of multiple

evaluators so that inter-rater reliability might be explored. Finding ways to connect the assessment findings from the four pillars to program learning outcomes could further enhance the holistic development of the student.

Interviews with various groups indicated that there is more work to be done. According to the IEC, the next step in fall 2016 is to generate course level assessment plans. The institution also indicated that Institutional Learning Outcomes (ILOs) needed to be developed, although the current utilization of department and program level outcomes may create some added complexity for ILOs. While colleges and universities can have various levels of learning outcomes: at the course, program, department and/or institutional level, given its straightforward mission, SPSU may wish to consider the number of levels that would be appropriate for its assessment pyramid. The institution also needs to increase the sophistication of its assessment tools, moving away from grading rubrics with very rudimentary categories (e.g., poor, fair, good, excellent) and designing tools that enable programs to assess multi-faceted outcomes and outcomes at the upper end of Bloom's taxonomy (e.g., critical thinking). It is also important for the institution to consistently utilize multiple sources of evidence for each of its department or program outcomes in order to triangulate its findings about student learning.

Findings. While the institution is to be commended for a substantial amount of progress in the area of assessment, culture is not built in a matter of months. The positive progress that SPSU is making needs to continue and to evolve in its sophistication in order to fully embed assessment into the fabric of the institution and to arrive where it needs to be to demonstrate educational effectiveness.

C. Issue: Program Review (CFRs 2.7, 4.3, 4.4)

A similar area of concern noted by the 2014 EER team and the subsequent Commission letter addressed SPSU's unformed program review process. The institution's written and verbal response acknowledged the challenges it has faced historically, and it seems to have made a concerted effort to rebound from these challenges. The establishment of the Institutional Effectiveness Committee, the Program Review Committee, and the development of a program review timeline and schedule all speak to the institution's commitment to construct a robust program review process. Of significant concern, however, is the seeming "late start" to this launch; notably, that the Pre-Theology program review did not begin until October 2015. The institution's report stated that the reason for the late start related to the re-crafting of the mission statement. However, other interviews indicated that the institution also struggled with motivation to engage in the program review process

until there was no choice but to proceed. It will be extraordinarily important for SPSU to continue its forward progress in order to allay concerns that the energy and focus was directed toward meeting the deadlines of the WSCUC site visit.

The institution chose to utilize the Pre-Theology program as a model for establishing a program review protocol. The team reviewed the Pre-Theology program review and all accompanying documents and spoke with its faculty. All evidence pointed to a strong first attempt at a comprehensive self-study, which included an external reviewer. While the institution had not developed a template for the self-study, faculty indicated that they modeled the review after the WSCUC “Resource Guide for Good Practices in Academic Program Review.” The process enabled them to make important changes to the curriculum based on the self-study and the external reviewer feedback. When asked about the quantity and quality of data that were reviewed, the faculty acknowledged that it used the data it could find, and that it would be helpful to have other sources of data, including information from external stakeholders such as bishops and vocation directors as to the student qualities that they believe are important (CFR 4.5).

As SPSU continues to play “catch-up” in the area of program review, it still needs to incorporate several of the aforementioned good practices, including the collection of feedback from external stakeholders, students, and alumni, as well as the incorporation of program review findings into the strategic planning and budgeting processes. The team also suggests that SPSU consider expanding its review process to other organizational units outside the academic realm.

Findings. SPSU successfully completed a review of its Pre-Theology Program in a short period of time. The institution has acknowledged the challenges associated with the development of a robust program review process. In particular, the institution seems to have experienced a particularly unusual number of delays in the program review schedule. While the delays have rationale, the lack of production on the part of SPSU hinders the team from making an informed conclusion as to the effectiveness of the program review process, particularly as it relates to subsequent improvements in educational effectiveness. The team appreciated SPSU’s candor regarding the challenges it has faced, and also recognized that the institution has a plan for moving forward, but a plan for moving forward is not the same as a demonstration of effectiveness.

D. Issue: Cultural Competence (CFRs 1.4, 2.2)

The July 2014 Commission letter referenced the EER team's observations regarding the institution's lack of a "comprehensive view" of the meaning of cultural competence. The EER team's finding of varying views and understandings informed the Commission's decision to include cultural competence as one of the six areas to be addressed in this 2016 Special Visit. The Commission letter asserted that "SPSU could benefit from developing a clear definition of cultural competence, reviewing how the definition is aligned with the institution's educational programs and identifying ways cultural competence can be assessed."

In its institutional report, SPSU shared the many significant transformations that had occurred since the EER visit, including the revision of the institution's mission statement. The context for this revision work was explained as a realization that emerged from the institution's inability to align their educational programs with the previous mission as a component of the program review process. The initial attempt at program review was placed on hold in order for attention to be directed toward achieving a mission statement that afforded the desired programmatic coordination and alignment. After discussion among the SPSU leadership, input from the faculty and feedback from the board, new mission and vision statements were developed and approved by the Board of Trustees in early 2015. One of the critical outcomes of this revision process was the institution's decision to remove specific reference to multicultural formation from its mission statement. The rationale offered for this decision included statements such as "'cultural competence' was too narrow and inappropriate for the mission statement," that "it does not lend itself to concrete assessment," and that "the faculty decided that to pursue this would actually detract from our primary work." The challenge that would be required to arrive at a consensus definition was also referenced. It appeared from the institutional report that cultural competence was no longer a formal institutional objective because it was no longer considered mission-centric as it had been in the past. However, the institutional report concluded with the statement that "It should be noted that cultural competence is still stressed, but on more local levels, such as in topics covered in classes, some practices in multi-ethnic parishes encountered in field education, and ethnic liturgies and celebrations conducted in the seminary."

On the SPSU website, under the heading of Academic Programs¹, the institution identifies seven themes that are maintained as integrated across the curriculum and students' theological studies. These themes are portrayed as fundamental to SPSU students' priestly formation. The seventh of these statements reads: "The

¹ This material was retrieved from <http://www.stpsu.edu/academic>

implications of living in a multicultural Church and world.” Furthermore, a review of materials submitted by the institution in advance of the team visit revealed minutes from the October 22, 2014 Board of Trustee meeting that included an appended document authored by the rector/president titled “Cultural Competence: a Theological Definition” offering a robust definition of cultural competence, as well as strategies, tactics, metrics, and assessments. The team interpreted these artifacts as evidence of the campus’s ongoing examination of cultural competence and multiculturalism and as a result included this topic as a line of inquiry for the visit regardless of its removal from the text of the SPSU mission statement.

According to interviews with the rector/president and the Board of Trustees, multiculturalism and cultural competence is part of the vision of the institution as represented by the reference to the Pacific region, and it was acknowledged that cultural sensitivity is important. The team was told that cultural competence is handled at the program level through courses (e.g., the requirement of Latin and option of studying Spanish in the Master of Divinity program) and immersion opportunities to learn both language and culture. The team was informed that the institution is engaged in conducting an inventory of immersion programs and exploring relationships with local language schools; it was acknowledged that these efforts need to be systemized in order to be consistent. The Institutional Effectiveness Committee affirmed that cultural competence is addressed in the formation phase. The team learned that cultural competencies are addressed in line with the needs that are expressed by local diocese and the practical demands of the bishops and vocational directors.

Some of those interviewed asserted that cultural competence was too narrow of a concept for the institutional mission, or that it is a concept too challenging to assess. However, many faculty and students alike mentioned that cultural events were very much a part of the student experience in the form of student-organized multicultural festivals held on campus, with liturgical life and Spanish-language and Latin-language masses, woven into courses such as Homiletics, and from the sheer diversity of the student body. It was evident from these discussions that culture was most frequently interpreted as ethnic/racial diversity, though some faculty commented on youth masses, marriage preparation courses, and diverse field education placements that may include prison ministry and ministry to immigrants and refugees. Particularly noteworthy to the team was the mention of the cancellation of a multiculturalism class that was heretofore a part of the M.Div. and Bachelor of Sacred Theology (STB) program. The team was told that the course needed to be modernized and is on hold until the M.Div. program review so that it

can be revised to represent current definitions and educational themes in multicultural education tied to theology.

Although the reference to cultural awareness was removed from the mission statement, SPSU has continued its institutional dedication to the development of cultural competence among its seminarians who will be regularly confronted by “the implications of living in a multicultural Church and world.” The team encourages SPSU to inventory the various manifestations of multiculturalism and activities intended explicitly or implicitly to nurture cultural competence in an effort to bring coherence and visibility to these endeavors and opportunities. Furthermore, the team suggests that SPSU engage the Institutional Effectiveness Committee and leverage the program review and student evaluation processes to encourage dialogue on how to conceptualize cultural competence in theological and ministerial contexts across its program, with the intent of developing a working definition of cultural competence that can be operationalized throughout the institution as a measurable outcome of the student experience. The institution will want to articulate and formalize its efforts to develop the cultural competency of the seminarians throughout their holistic academic, co-curricular, and pastoral formation phases. Specifically the institution needs to define and assess the attitudes or skills needed by seminarians to serve effectively a multicultural Church and world, and to align the institution's educational programs with the vision to serve the Pacific Region.

Findings. SPSU addresses multiculturalism and cultural competency in a variety of ways: incorporation of the topic in existing courses; institution-wide multicultural festivals, events, and liturgies; immersion opportunities to learn language and culture; and field education where students get direct experience in multi-ethnic parishes. SPSU is encouraged to continue its efforts to develop the competencies of its seminarians who will be living in a multicultural Church and world.

E. Issue: Organizational Structure (CFRs 3.2, 3.6, 3.7)

SPSU was asked to address a number of issues related to organizational structure. The team focused its analysis of SPSU’s efforts to address the Commission’s concerns as follows:

1. As described in position descriptions, have responsibilities (assignments) been fairly apportioned and aligned with “priorities in the strategic plan and institutional goals?” Will the revised organizational structure assist SPSU to achieve “greater stability and effectiveness in its organizational structure?” (CFRs 3.6, 3.7)

2. Has SPSU completed “a careful review and consistent application of its HR policies and procedures related to hiring, orientation, training, and performance management?” (CFR 3.2)
3. Are the “policies and procedures in the (staff) handbook being consistently followed?” (CFR 3.2)

In its institutional report, SPSU described the outcome of its efforts to address these questions as follows:

A reorganization was completed which attempted to define administrative roles and responsibilities clearly, mark efficient lines of communication, institute best practices in hiring and firing, provide smooth and effective orientation and training modules for new faculty, and comprehensive performance review for faculty members.”

Based on the work of a consultant who conducted an administrative audit for SPSU, there has been a re-organization of the administration. A key recommendation in this audit was for SPSU to create a structure based on the scale it needs. SPSU put in place a modified administrative structure for 2014-2015, which set the stage for a more substantive reorganization for the 2015-2016 academic year. Key outcomes of the 2014-2015 changes were: splitting the responsibility for the academic program and for development, recognizing the chief academic officer as the vice rector (second in command), and creating the position of the vice president for administration which began to bring into a single portfolio normative for a chief operating officer (C00) responsibilities.

SPSU then revised its administrative structure again for the 2015-2016 year, eliminating the now unneeded position of provost; as well as outsourcing to the Archdioceses certain bookkeeping and accounting functions. SPSU then merged finance, human resources, and facilities management into the COO’s portfolio and renamed this position vice president – operations. In addition, SPSU added the position of permanent ALO with a relatively broad set of responsibilities (e.g., institutional research and other accreditation-related responsibilities, as well as coordinating SPSU’s strategic planning efforts, plus other enumerated responsibilities).

SPSU also created two new significant committees: the Institutional Effectiveness Committee and the Program Review Committee. The Institutional Effectiveness Committee, formed in November 2015, is a permanent standing committee created to assist the president/rector in determining how to address strategic planning, program review, assessment, faculty development, and operations. The campus has

also instituted a Program Review Committee with the charge to coordinate all needed program reviews. It may prove valuable for a formal charge to be developed for each of these committees and for some form of minutes to be maintained.

SPSU has implemented an organizational structure, which seems to be appropriate for this type of institution. It now has a mix of individuals who have exhibited their commitment to SPSU and the Sulpician approach to developing clergy, along with a few key individuals from outside of SPSU who can bring a fresh perspective as to how to address the multiple challenges this institution faces. The structure and individuals now in place have the potential to give SPSU “greater stability and effectiveness in its organizational structure.” It may serve SPSU well to reflect on some of the specific assignments found in some of its position descriptions as these roles become more clearly defined by the work needed to be done. As an example, the vice rector/academic dean position description seems to be thin in the areas of program development, program review, and assessment. The ALO position seems to be broader than the area of accreditation. This may mean there is the need to alter the scope of this position or to alter the position’s title.

Department chairs continue to play a pivotal role in assessment and program review, as well as addressing normative efforts in selecting adjunct faculty, student advising, course scheduling, and the like. In interviews, the department chairs made clear that they now feel more supported in doing assessment and program review. The efforts of the ALO in faculty development have increased the capacity of department chairs and faculty to do the needed work in these areas.

In addition to its administrative structure, the institution addressed other matters of concern such as formalizing a hiring process for faculty and staff. For faculty and senior staff, the hiring, firing, and performance review processes are now under the purview of the rector/president, assisted by the vice rector/academic dean. The institutional report discussed an annual faculty review process which begins in the summer with each faculty member compiling a portfolio based on a set of guidelines. Then in the fall the rector and vice rector meet with each faculty member, and a written summary of the meeting is provided. The discussions on site confirmed these processes have begun.

The institutional report described a new process for orienting and training faculty. Starting in October 2015 SPSU initiated “an eighteen-month intensive program designed to close the gap regarding faculty knowledge of assessment, SLO’s, and program review.” This process is being implemented under the auspices of the IEC

which means it has the support of the most senior campus committee. As of the site visit, SPSU was on schedule with this training effort.

In addition to strengthening faculty hiring and training, SPSU has regularized the policies and procedures in the staff handbook and the application of these policies. From interviews with the staff and the faculty, the team concluded that SPSU is now applying policies and procedures consistently and is working to develop and implement needed additional structures (e.g., an employee evaluation system).

As valuable as these efforts may be, retaining staff and faculty to provide consistency in programs, services, and policy implementation may well be even more essential. The team was told in one session that since 2012 more than 50 people “have come and gone,” which is a disconcerting fact. In discussions with the students, the team was told of the multiple ways this turnover impacted their education, including: inconsistent formation advising, inconsistent application of the annual student review, changing degree requirements, inconsistent course scheduling, as well as turnover in student services.

One contributor to employee turnover, and an important element to address as part of effective organizational structure, could be the communication and decision-making strategies that are utilized by SPSU. Multiple constituents expressed a desire to be more in the loop on decisions and to know more about what was happening within the institution. Too often, the team learned, that impacted personnel were not involved in the decision-making process, that there were times decisions about new initiatives/programs were not shared with those directly affected, and that there were multiple times where the rationale for a given decision was not communicated. At the same time, there were multiple individuals who provided examples of the significant improvements in internal communications and the positive impact of administrative efforts to make the institution’s funding far more transparent.

The core of what makes SPSU work is a staff highly dedicated to its mission.² With modest compensation, uncertainty about continued employment, combined with the knowledge of historical turnover rates, key forms of recognition include a belief that one’s efforts are valued and perspectives are heard and seriously considered. As one person said, “we need to develop a culture of listening.” To promote trust, openness, and transparency, the SPSU community needs to feel engaged and

² At the same time, in the meeting with the staff, with the exception of one individual who has a more substantive position, none were aware the mission and vision statement had been changed. Nevertheless, they all understood the core mission was to enable “the men” to be prepared to go into the priesthood.

heard before new strategies, assignments, and policies are determined and announced. In the collaborative spirit that permeates higher education, the SPSU staff and faculty want and expect a decision-making process, which validates their commitment and their voice, even if final determinations may not be what an individual might prefer. The team found the statement that SPSU needs “greater consistency and fidelity to process” as something that those leading SPSU need to hear and implement.

It is clear that the unusually high turnover of staff and faculty at all levels of the institution has hindered SPSU’s progress to work effectively as an organization. As noted previously, the team also heard from the students how these personnel changes has significantly impacted their education. The team sees as a critical task the need to create clear strategies and inclusive systems to facilitate a decision-making process that will be embraced by the SPSU community. This effort must be of the highest priority for the Board of Trustees, president/rector, and the administrative leadership team.

Findings. SPSU has revamped its organizational structure to be more in line with institutions of higher education; clarified administrative position descriptions; regularized faculty orientation, hiring and training; and reviewed, revised and consistently applied HR policies and procedures. Of concern to the team is past employee turnover and the need for SPSU leadership to strengthen communication and more actively engage those directly impacted in the decision-making process.

F. Issue: Technological Infrastructure (CFRs 3.7, 4.5)

In the Commission’s letter, SPSU was alerted that upgrading the information technology infrastructure was an urgent matter, particularly in the areas of administrative software(s) to support accounting, HR, and advancement. In the EER team report, it was observed that “[c]urrent systems of data collection seem inadequate to support a growing culture of assessment or to provide meaningful data on student progress towards a degree.” Based on this, the institution was cited for lacking sufficient systems of data collection to promote effective data analysis, interpretation, and application of data analytics for institutional research purposes (CFRs 3.7, 4.5). It was expected as part of the 2016 Special Visit that SPSU would be able to demonstrate plans for technological improvements to enhance administrative and institutional functioning.

The SPSU institutional report was replete with details of not only plans, but significant accomplishments toward this Commission's expectation. SPSU has

adopted Populi, a cloud-based, college management system to support the routine operations of the registrar's office. The registrar, who is new to this role at SPSU, has begun implementing best practices for digital data collection and reporting, course scheduling, record keeping, and enrollment management. Interviews with students confirmed that Populi is now used for course enrollment. Populi also provides a course-based learning management system for faculty and students. Faculty noted and students confirmed that Populi is used to disseminate syllabi, course readings and lecture notes; collect assignments; take attendance; employ discussion forums; and post grades. Faculty noted that the next wave of software training will be on how to use Populi to conduct assessments, though some instructors did mention that they are already using this feature. While students acknowledged some variability in use of Populi across their programs of study, the degree of adoption and implementation among faculty of this new electronic system is remarkable.

At the time of this visit, the SPSU library was implementing the transition to a modern, electronic catalogue, thus migrating from EOS International Integrated Library System to global library OCLC Worldshare Management (WMS). Interviews with technology personnel and the library staff confirmed the benefits that are being derived from the library's connection to consortia for theological resources and general resource sharing through the Statewide California Electronic Library Consortium (SCELC). The library staff has demonstrated considerable dedication of time, energy and spirit toward increasing access to scholarly and other digital publications and enhancing patrons' experience with these resources. The team learned that the library staff is involved with technology training for faculty, students, and staff. The library team has conducted faculty and student trainings in the use of Populi, as well as the resources developed with the library research guide system Subjects Plus 3.0 and SPSU staff developed *Guide on the Side* tutorials. Training in the WMS electronic catalogue will be initiated once the migration has been completed.

Finally, the campus has made a concerted effort to improve the Wi-Fi and technical support services through an external vendor. The team learned that this was made possible through a grant to the archdiocese of San Francisco for infrastructure upgrades made on the campus. Through what SPSU called the Networking Improvement Project, it has updated network hardware and wireless infrastructure providing greater stability, security, monitoring and increased bandwidth. The campus receives ongoing technology support through the external vendor GDR Group for services such as hardware and software support, technology set up for new employees, licensing renewals and updates, including security and antivirus

software, and hardware inventorying to inform the campus's hardware replacement monitoring. A GDR representative is on campus at least one day per week, and the vendor provides 24/7 call service. As noted above, the library staff appears to have a great deal of involvement in the technology support of the campus, particularly in the areas of software training and website support. During the visit the team heard comments from some faculty, campus leadership, and staff that suggested that this overlap of technology support between GDR and the library staff has led to some confusion or extension of roles and responsibilities that SPSU leadership is encouraged to clarify.

Findings. Considerable progress has been made in upgrades to technological infrastructure and support, toward implementation of new cloud-based data management and learning management systems, and upgraded library software systems. Interviews with campus leaders, faculty, staff, and students suggested that there are still developments and improvements to be made in terms of the user friendliness of the institution's website, use of social media, network access and reliability, and proxy access to library services. The need for ongoing training in new and upgraded technology was acknowledged as well. Overall the campus is to be congratulated on its accomplishments in terms of technology. SPSU is encouraged to maintain this commitment to ongoing technological improvements, and to seek to address the areas of technology training, utilization, and access that the community itself has identified.

SECTION III – OTHER TOPICS

As the team worked through the materials from SPSU and conducted interviews during the site visit, three other areas emerged for increased attention. The areas are: enrollment and its impact on annual budgets and course offerings; the plan to design a new development effort to fund capital projects and, if possible, expand the operating budget; and the unique governance issues presented by the relationship of SPSU to the Archdiocese and to the Sulpician Order.

Enrollment (CFR 3.4)

SPSU has seen an approximately 25% reduction in enrollment in the past few years. In terms of the annual operating budget, SPSU needs approximately 80 students to meet its current costs. This does not include possible costs for new programmatic initiatives or capital needs. It now has 67 students. This means appropriately identified temporarily restricted funds are currently being used to cover the approximately \$300,000 deficit projected for this fiscal year.

The strategic plan calls for certain marketing and external communication efforts to increase enrollment. Recruitment for SPSU is based on encouraging bishops from the regions to send prospective priests. The sponsoring bishop is responsible for funding a significant proportion of a student's cost to attend. Thus recruitment is based on relationships with the future employer of each student. While SPSU recognizes how critical it is to increase enrollment, at this time the reasons for the decline in enrollment appear to be primarily anecdotal. The sole exception is the significant reduction in recruitment of international students to SPSU.

The main point person to interact with the multiple feeder entities is the rector/president. With the scope of his duties and the broad geographic region, it may be difficult for one person to reasonably and quickly turn enrollment around. SPSU might expand its reach and recruitment efforts by identifying others who could be engaged in working with appropriate persons in each region. SPSU may also want to consider how the Pre-Theology program might be used to increase enrollment. The Pre-Theology program could be a unique recruitment strategy as those interested in pursuing the priesthood may increasingly come from non-traditional backgrounds. With its recently completed program review, it seems there may be adequate information on how to enable this program to increase its enrollment.

Development and Finance (CFR 3.4)

The team concluded that SPSU is financially viable. With an endowment in excess of \$30,000,000 and temporarily restricted funds of approximately \$2,000,000 which can be used to address designated operational and capital costs, the approximately \$300,000 needed for annual revenue (including a 4% draw against the endowment) can easily be covered for many years. Yet this annual shortfall, and the fact that SPSU is striving to not draw down its endowment, means the institution has a tight operating budget. To fund a new initiative may mean reducing funding somewhere in the current budget³. SPSU recognizes the need to diversify its revenue streams and to increase private giving.

SPSU has approximately \$4,500,000 in deferred maintenance. There is some limited funding to address emergencies in the temporarily restricted funds and the capacity to cover the cost of a few minor capital costs in the operating budget. The

³ We were told SPSU has an approximately \$4 million operating budget. 48% of the budget comes from tuition, approximately 30% comes from a 4% draw on the endowment, 12.5% from annual giving, 7.5% from temporarily restricted funds and 2% from other revenue.

plan for addressing the deferred maintenance is private giving. SPSU made a conscious determination to terminate its former development staff and to start over. The institution plans to identify a search firm to gain quality candidates, and then ask the individual selected to create a comprehensive development plan that would include an analysis of donor readiness for a capital campaign for deferred maintenance.

Currently SPSU generates approximately \$500,000 annually in private gifts, primarily through several signature events. It seems highly probable that as SPSU finds the right lead person for development, it is then looking at a multi-year timeline before there will be an appreciable increase in private giving.

The team encourages SPSU to develop a workable plan to remove its structural deficit and to continue its efforts to develop a robust plan for private giving.

Governance (CFR 3.9)

SPSU is owned by the Archdioceses of San Francisco, has an agreement with the Sulpician Order to run the institution, and has a Board of Trustees with the presence of individuals who report to the Archbishop. At the meeting with the board, the Archbishop, who is also the chairperson, noted the efforts to develop the board including establishing committees, altering the membership of the board to add more independent members, and expanding the issues being addressed by the board. Given the complexity of these multi-party relationships, the team encourages SPSU to review board activities and operations in light of the WSCUC Independent Governing Board policy to ensure compliance.

SECTION IV – COMMENDATIONS AND RECOMMENDATIONS FROM THE TEAM REVIEW

Commendations

The team commends SPSU for:

1. Its integrity, transparency and openness throughout the review process. The report and subsequent interviews were honest and candid. All those the team interviewed were forthcoming and straightforward in sharing their experiences.
2. Making considerable progress in a short period of time in the area of program review. The institution completed a full cycle of review for one program and

articulated clear next steps in the process, including developing systematic procedures and a schedule for additional reviews.

3. Making considerable progress in a short period of time in the area of assessment by developing or revising course learning outcomes, beginning to align them with department outcomes, and operationalizing outcomes so that they are now observable and measurable.
4. Improving its technological infrastructure and support as well as implementing new and upgraded software systems. SPSU adopted the Populi cloud-based, college management system; the library is transitioning to an electronic catalogue and has upgraded its databases to enhance access to scholarly and other digital publications; and the institution has made a concerted effort to improve Wi-Fi and technical support services through an external vendor.
5. Investing time and energy in faculty development in the areas of assessment and in training related to Populi. The 18-month faculty development program has advanced the institution's knowledge of the importance of assessment.
6. Revamping its organizational structure and adding dedicated, experientially diverse, and qualified employees.

Recommendations

The team recommends that SPSU:

1. Continue to work on its strategic plan to accomplish the goals and objectives by the deadlines identified. In particular, SPSU needs to develop strategies that will result in sustainable enrollment and that will generate revenue. (CFRs 3.4, 4.1, 4.5, 4.6)
2. Improve upon its new organizational structure by empowering administrative leaders to enact change in their areas of responsibility and by designing clear communication and transparent decision-making processes. (CFRs 3.2, 3.6, 3.7, 4.5, 4.6)
3. Articulate and formalize efforts to develop the cultural competency of the seminarians throughout their holistic academic, co-curricular, and pastoral formation phases. Specifically the institution needs to define and assess the

attitudes or skills needed by seminarians to serve effectively “the Roman Catholic Church in the ministerial context of the Pacific Region” and to align the institution’s educational programs with this vision. (CFRs 1.4, 2.3)

4. Move to the next level of institutional engagement in assessment by designing multiple methods of assessment for each department and/or program level outcome, consistently aligning course outcomes with program outcomes and with the mission and vision, and creating assessment tools that accurately determine if competence has been achieved. (CFRs 2.3, 2.4, 2.6, 4.3)
5. Strengthen and improve the annual evaluation of students, employing proven practices in assessment, as appropriate. (CFRs 2.3, 2.4, 2.6)
6. Build upon the steps taken to articulate a coherent and meaningful program review process by adhering to the program review schedule, developing a template or standardized set of questions for the program review self-study, and integrating program review findings into budgeting and strategic planning. (CFRs 2.7, 4.3, 4.4)