

REPORT OF THE WSCUC TEAM
For Reaffirmation of Accreditation

To Mills College

September 10 - 12, 2019

Team Roster

Lynn Pasquerella, Chair

President, Association of American Colleges and Universities

John Hofmann, Assistant Chair

Director of Assessment, Saint Mary's College of California

Susan Hippensteele

Professor, Women's Studies, retired, University of Hawaii at Manoa

Bruce Johnson

Chief Budget & Planning Officer, Charles R. Drew University of Medicine and Science

Tamela Hawley

Staff Liaison, 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.

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SECTION I – OVERVIEW AND CONTEXT

(Approximately 10–20% of entire report, 3–8 pages)

A. Description of Institution and Accreditation History

Mills College is an independent liberal arts college, offering bachelor’s degrees to women and gender non-binary undergraduate students, as well as graduate degrees and certificates to students of all genders. Founded as a Young Ladies Seminary in Benicia, California in 1852, Mills moved to its current location of Oakland, California in 1862, after being purchased by missionary educators Susan and Cyrus Mills. Chartered as a non-sectarian college for women in 1885, Mills became the first women’s college west of the Rockies. In 1920, a School of Education and a School of Graduate Studies were established. A Graduate School of Business and Public Policy was added in 2015.

At the time of the submission of institutional report for reaccreditation, Mills serves 766 undergraduate and 489 graduate students from 41 states and 15 countries. The mission of the College is to educate students to “think critically and communicate responsibly and effectively, to accept the challenges of their creative visions, and to acquire the knowledge and skills necessary to effect thoughtful changes in a global, multicultural society.” Mills College’s commitment to equity, access to excellence in higher education, gender and racial justice is central to its academic, co-curricular and residential life programming and is reflected in the demographics of the student body. Nearly all undergraduate students, 98%, and 87% of graduate students receive financial aid. In addition, 59% of undergraduates and 46% of graduate students are individuals of color. Thirty-two percent of the undergraduate students are first-generation and 15% are resuming students, age 23 and over. Approximately half of the students identify as LGBTQ+. A high proportion of all students report psychological, cognitive and physical disabilities.

Mills has been accredited by WSCUC since 1949, with the latest comprehensive reaffirmation completed in spring 2011. An Interim Report was submitted in 2014, and a Mid-Cycle Review was

conducted in 2016. In 2011, the Commission recommended remediation in the areas of assessment, program review processes, general education revision and support for faculty teaching and technology. In response to concerns regarding the complexity and sustainability of the proposed assessment structures and the need for further progress in student learning outcomes assessment, the administration initiated a comprehensive assessment strategy to align, coordinate and streamline processes. The College's efforts to deepen engagement in assessment across campus and ensure that assessments result in valid and reliable data resulted in a commendation by the Interim Report team. Continued progress is being made toward the identification and analysis of curricular and co-curricular connections and their relationship to the Institutional Learning Goals.

In addressing the Commission's recommendation that greater emphasis be placed on the program review process and on integrating the discussion of student learning outcomes with the review of physical space and staffing levels, the College revised The Mills Program Review Guidelines to conform to the WSCUC Program Review Guidelines. To enhance resource management, the College has instituted a process of submitting quarterly reports of departmental operating budgets to the Office of the Provost. Moreover, in 2014 the College undertook an audit of the extent to which learning spaces promote active learning pedagogies. These initiatives coincided with a comprehensive review of the General Education program, with an emphasis on core competencies of critical thinking and information literacy. As a result, the College revised its General Education Program and implemented a new Core Curriculum.

The College also established a Center for Teaching and Scholarship to promote faculty professional development and facilitate the assessment of student learning. The Interim Report of the Commission cited Mills' efforts to promote assessment of student learning outcomes through technological resources. Since then, the College has made further progress addressing the recommendation to engage students in their own learning with the adoption of an ePortfolio program for all first-year students.

B. Description of Team's Review Process

The site visit team conducted an Off-Site Review (OSR) on February 5, 2019, and submitted formal lines of inquiry to the Mills' leadership for their response. The campus visit, September 9-12, 2019, included meetings with President Beth Hillman, her senior leadership team, Mills College's Board of Trustees, various staff and committees. The list of individuals and groups met by the team include:

- Provost and Dean of Faculty
- Vice President of Strategic Partnerships
- Vice President of Enrollment and Marketing
- Vice President for Student Life and Dean of Students
- Vice President for Finance and Administration
- Associate Provost for Teaching, Learning and Faculty Affairs
- Members of the Board of Trustees
- Associate VP for Finance
- WSCUC Steering Committee
- Assessment Committee
- Retention, Academic Success and Advising Committee
- Faculty Executive Committee
- Members of the Staff Council
- Graduate Council
- Deans and Department Chairs
- Representative groups of faculty and students
- Finance, Payroll and Accounts Payable staff
- Learning, Advising and Balance staff
- Chief Human Resources Officer and selected staff members
- Members of the Office for Planning, Analytics and Effectiveness (Institutional Research)
- Student Governance and Club Leadership
- Chief Technology Officer and several direct reports
- Distance Education Committee

In addition, two team members held a phone conversation with the Director of Student Access and Support Services, three team members held a phone conversation with the College's accountants (the Partner and Senior Manager from Crowe, LLP) and a confidential e-mail account was established to solicit input.

Prior to the off-site review and subsequent to the submission of documents requested in the Lines of Inquiry, team members reviewed a wide range of print and digital materials. These included the current

and most recent strategic plans; the financial stabilization and tuition reset plans; the new program approval process; the WSCUC Substantial Change report and Educational Effectiveness Review; Mills Next; enrollment dashboards; the Wellbeing Survey; the assessment summary and training guides for the use of Taskstream; online learning platforms and archived/active courses; ePortfolio samples; retention and budget reports; core curriculum, rubrics and co-curriculum mapping; sample syllabi; guiding principles; meeting minutes; integrative learning goals and measurable criteria; space utilization reports; the UC Berkeley-Mills Collaboration; the Oakland Promise; the Resolution of the Board of Trustees regarding the financial emergency status; faculty and employee handbooks; committee and position descriptions; and endowment reviews.

C. Institution's Reaccreditation Report and Update: Quality and Rigor of the Report and Supporting Evidence

Planning for the Mills Re-Accreditation Review began in spring 2017 with the appointment by the college leadership of team members and point persons for each of the components of the Institutional Report. The College provided constituencies across campus opportunities to engage in facilitated discussion about the re-accreditation process and the tasks of the Institutional Report teams. In August 2017, the Accreditation Liaison Officer (ALO) presented a summary of the most recent comprehensive re-accreditation review (2011), the interim report (2014), the mid-cycle review (2016), the responses of the college to WSCUC feedback and the next steps in the re-accreditation process at a faculty retreat. The ALO presented similar informational sessions to the College Officers and staff in the Division of Student Life. WSCUC staff liaison Tamela Hawley also gave a presentation to the campus community in September 2017 on preparing for 2019 review.

In November 2017, Mills established a Steering Committee and created a timeline for completion of the Institutional Report. The Assessment Committee also assumed a leadership role in preparing the community for the re-accreditation review. Together, they embarked on a process of rigorous inquiry with

searching questions, appropriate methodology, and effective use of evidence. The College completed a draft Institutional Report in August 2018 that was reviewed and revised by the Steering Committee, the President, College Officers, and Board Chair. The Steering Committee then shared the resulting draft with faculty and staff for comments with a final report later posted on the Mills website. The self-review process led to a greater understanding of institutional effectiveness and directions for improvement.

The Institutional Report is clear and well-organized and reflects a commitment to openness and transparency regarding the challenges and opportunities facing Mills. The report highlights the financial realities that led the Mills College Board of Trustees to declare a financial emergency in the Summer of 2017 and adopt a Financial Stabilization Plan that June. In addition, the report details the impact of the academic restructuring that followed and proposed action steps suggestions for strengthening Mills for the future.

SECTION II – EVALUATION OF INSTITUTIONAL ESSAYS

Component 1: Response to previous Commission actions

Please see Section 1.A. for description of issues raised in previous Commission actions and reviews and a summary of how the institution has addressed them.

Component 2: Compliance: Review under WSCUC Standards and compliance with federal requirements; Inventory of Educational Effectiveness Indicators

Standard 1: Defining Institutional Purposes and Ensuring Educational Objectives

Institutional Purposes

Mills College provides clear statements of purpose that express institutional values and commitments to serve their students and extend outward to local and global communities (CFR 1.1). The College possesses a clear understanding of their mission and educational objectives and a deep feel for the distinctive type of education and transformative experience they seek to provide to both

undergraduate and graduate students. Mills translates their expected educational outcomes into specific indicators of student achievement at course, program, and institutional levels (CFR 1.2).

Integrity and Transparency

The College provides a detailed statement on their website outlining their commitment to diversity, social justice, and equity, which they recognize as “key components of academic, co-curricular, and residential life” (CFR 1.1, 1.4). In addition to this published statement, the College has created a dynamic and highly invested Equity, Inclusion, and Social Justice Committee that works with both students, staff, and faculty, and whose experience, insights, and recommendations inform institutional policy and practices to ensure Mills lives up to these commitments.

The team observed or reviewed multiple lines of evidence confirming that the College operates with organizational integrity and abides by sound business practices (CFR 1.7). While the College has published retention and graduation rates on a webpage titled Consumer Information Details, this information page requires updating. Specifically, the College should provide retention and graduation rates for its most recent cohorts and, aligned with best practices for reporting these measures, provide more than one year of data (CFR 1.2, 1.6). This page should also provide figures for the expected time to degree. Also, the Net Price Calculator on the Mills website only provides information on Presidential Scholarship funds available to incoming students. While Mills provides a web page detailing tuition costs for 2019-20, they do not provide an estimate for the overall cost of the degree. Both items (time to degree and estimated cost) should have dedicated web pages and be included in their list of links located on the webpage titled Consumer Information Details.

Standard 2: Achieving Educational Objectives Through Core Functions

Teaching and Learning

In 2013, Mills began a comprehensive effort to re-articulate what it means for a student to earn a baccalaureate degree at the College. Between 2013-2016, the Curriculum Transformation Task Force reviewed and revised Mills' general education program into the current Core Curriculum (CFR 2.1), using a process that has enabled them to reassess and clarify the meaning of a Mills undergraduate degree and integrate that meaning into the revised Core (CFR 2.2a). Consisting of four fundamental skills, four modes of inquiry, and two contributions to knowledge and community, the Core is central to delineating the Mills baccalaureate degrees. The Core is intended to ensure breadth of knowledge and to extend a set of foundational skills into students' application of certain key methods of inquiry today—inclusive of critical race theory, critical gender studies, and scientific inquiry—as they contemplate and begin to identify what it means to be engaged citizens and to lead productive and meaningful lives. (CFR 2.3) Although the curriculum review does not appear to have included students in active roles, it nevertheless appears to have captured key cultural values and academic expectations widely reflected within the Mills student body.

Approval and adoption of the Core Curriculum was followed by efforts among faculty and staff to articulate a set of institutional learning goals (ILG) at both the undergraduate and graduate levels. The College intended to identify ILGs that were general enough to incorporate learning across the full range of degree programs offered at Mills while specific enough to capture the distinct meaning of a Mills' degree. This work has allowed faculty and staff to use the ILGs to identify connections between curricular and co-curricular programs (CFR 2.3, 2.11). Mills reports the process met several ends, including but not limited to evaluating the cohesion and coherence of students' educational experience and providing a single framework for collecting evidence on the quality of a Mills degree (CFR 2.2a, 2.2b).

While faculty of individual programs establish standards of performance for specialized and content knowledge, multidisciplinary groups of faculty teaching courses that support specific ILG determine standards of performance for institution-wide areas (CFR 2.4). With the possible exception of

programs reviewed by other external accreditors and the state of California, learning outcome data are collected primarily in program capstone courses, although efforts are underway to modify and expand data collection for student performance indicators.

During the 2017-2018 year, the Assessment Committee, newly configured to include faculty and additional staff, began examining structural cohesion and coherence across programs by asking all degree granting programs to analyze the curricular design of their capstone projects (CFR 2.2a). Mills cites this process as having helped faculty across programs understand how their programs and majors engage with ILGs. Moreover, this process set the stage for completing an important mapping project by taking the college-wide data back to departments and programs where faculty and staff explored how they might better support ILGs. Beginning in 2020, when the first class of students completes the Core Curriculum as part of their Baccalaureate degrees, Mills will embark on a complete assessment of ILGs throughout the curriculum (CFR 2.3).

Mills cites its MPOWER signature experience as the most significant expression of the unique quality of a Mills baccalaureate degree. The MPOWER experience consists of four components: 1) Academic Success Teams that include a faculty advisor and academic navigator, 2) a community engaged learning experience, 3) a faculty mentored capstone project, and 4) embedded career guidance and mentoring (CFR 2.5, 2.12, 2.13). The Academic Navigator element of MPOWER, launched in fall 2018 and coinciding with the hire of two advisors, was cited by faculty and students as a significant improvement for first year advising compared to prior Mills models. While emphasizing movement away from a “deficit model” to embracing students’ different ways of learning, the Academic Navigators enjoy the autonomy necessary to initiate, pilot, and implement program improvements, reflecting what appears to be a Mills leadership priority, i.e., to hire smart people and let them do smart things.

Another key development with regard to the meaning, quality, and integrity of Mills’ degrees is a new approach to the first-year experience, which since fall 2017 includes first-year seminar, first-year

advising, first-year book, and a curated first-year course curriculum. E-Portfolios have been incorporated as a component of the first-year experience as well and appear to be used across several disciplines. Mills also began a pilot program for the first-year seminar in fall 2015, offering an interdisciplinary seminar for 60 entering first-year students. In fall 2017, Mills transitioned to a required first-year interdisciplinary seminar for all entering first-year students. Developed by a faculty team in collaboration with the Division of Student Life, and taught by full-time faculty, the seminars include a common theme, a common book, and faculty lectures on the theme from a variety of disciplinary perspectives. This model was assessed in spring 2018 and additional changes were made to the first-year seminar model in fall 2018. Follow-up plans are in place to determine further the ways that this common educational experience brings meaning to a Mills degree (CFR 2.13).

At the graduate level, Mills cites ILGs as unifying all nine of its degree programs while also citing additional organizing principles as key to achieving its mission, such as the “four pillars of ethical decision-making and governance, social and community accountability, equity, diversity and inclusion, and environmental sustainability” deployed by the Lokey School (CFR 2.2b). In addition to an emphasis on social change and justice, Mills graduate degree programs encourage students to develop skills transferable to employment settings upon graduation by offering a menu of courses and opportunities for assistantships, externships, and mentored pre-professional activities (CFR 2.2b). The spring 2019 Assessment Plan identified, among other things, a lack of alignment between current ILGs and graduate program goals and outcomes, prompting further revision to the current ILGs which Mills will begin addressing this coming academic year.

For the past three years, Mills has put significant effort toward skill development among its teaching staff. In 2016, the Provost’s team was restructured to include an Associate Provost for Faculty Development (a new administrative position since revised and renamed Associate Provost for Teaching, Learning and Faculty Affairs) and the Center for Teaching and Scholarship (CTS) was established. Mills

cites these efforts as reflecting a robust faculty development program of best practices for teaching and student success (CFR 2.4). The CTS has led to a number of initiatives intended to refocus institutional resources and structures toward an emphasis on student success, offering workshops open to all teaching faculty. Topics have included: teaching writing, lecturing, using metacognitive reflection, leading discussion, and using small collaborative groups. Between six and 12 faculty participate in each workshop and between 2016 and 2018, while 54 teaching faculty (about 45% of the total faculty) have taken part in one or more workshops (CFR 2.8).

Overall, it appears that Mills' degree programs reflect appropriate content, standards, and degree-level requirements; it is less clear, however, whether there are sufficient qualified faculty in all departments to sustain current degree programs while at the same time developing new degree programs (indicated as "in-progress" in supporting materials provided to the team) (CFR 2.1). Program reviews dating back several years cite critical staffing shortages, and a review of current faculty rosters in these same departments indicate that no new faculty have been hired. In at least a couple of cases, departments have lost additional faculty since the last program reviews were completed. Program reviews provided were comprehensive and complete, and external reviewers suggestions appear to have been taken seriously by department faculty (CFR 2.7).

During its site visit, team members explored current staffing issues by asking constituency groups two questions: 1) How is the college moving forward to address staffing concerns and ensure that scarce resources are being allocated properly? 2) Is Mills able to demonstrate the return on investment of administrative hires with respect to retention, completion, assessment, student success, and student satisfaction? On both points faculty, staff, and administrators aligned in agreeing that the administrative reorganization that resulted in new executive positions has produced greater efficiency, reinforced Mills values, and underscored the academic mission and priorities. As the team learned, these outcomes were in no small part due to Mills having hired from within for most of the Academic Affairs positions (CFR 2.8,

2.10, 2.13). Faculty reported that having the new Associate Provost positions filled from faculty ranks has helped provide important continuity during a time of retirements and resignations in which institutional memory is in short supply in some programs, and helps ensure that hiring of teaching staff continues to address program and student needs (CFR 2.1).

Mills faculty and administrators report having struggled to align student, program, and institutional learning outcomes. The team noted the Institutional Report contains inconsistent references and descriptions of learning outcomes across different sections of the Report, suggesting a lack of clarity at the College about how these can and should be aligned and utilized. Mills' report notes that only about 30% of programs use indirect evidence to complement direct evidence of student learning, and a majority of programs rely on summative assessment (senior thesis and/or senior project artifacts) to the exclusion of formative assessment. A more recent spring 2019 effort to clarify learning outcome alignment and goals shows Mills' faculty and staff continue to make progress and increase their sophistication in identifying productive and effective approaches to this critical area (CFR 2.3, 2.4, 2.6, 2.8). In addition, Mills has acknowledged that faculty continue to lack the full range of teaching, learning, and assessment development opportunities, as evidenced by the over-reliance on summative assessment of ILGs and lack of definitional clarity regarding different types of assessments commonly deployed in higher education. The additional resources and new administrative positions devoted to teaching and student learning assessment should help, and campus interviews with relevant offices during the site visit indicate that Mills is both aware of its existing resource and training needs and is taking concrete steps to address them. These issues concerning resource and training are addressed further in Component 6 of this report.

Both its transfer policy and procedures are publicly available and readily accessible on the Mills' website, which includes a clear statement of criteria established by Mills regarding transfer of credits earned at other institutions, transfer application links, and relevant contact information (CFR 2.14).

Standard 3: Developing and Applying Resources and Organizational Structures to Ensure Quality and Sustainability

Faculty and Staff

Mills has dedicated faculty and staff who further the College mission through active and creative engagement in promoting student success at both the undergraduate and graduate levels. Faculty, staff, and administrator initiatives reflect systemic efforts to increase retention and completion that are responsive to the changing demographics in higher education and align with the College's mission.

The team queried multiple groups and stakeholders about the impact of personnel reductions on various facets of Mills' operations and overall sustainability. Notably, multiple groups and individuals reported in some instances that personnel turnover provided opportunities for testing or implementing new ideas and methods or to think creatively when deciding how to meet student needs and engage in more general problem solving. At the same time, virtually all groups and stakeholders reported feeling 'bandwidth challenged', and several mentioned that the current pace and expansion of roles and responsibility for some faculty and staff (e.g., additional committee assignments, advising, training activities, etc.) is not sustainable in the long term. These stakeholders also expressed dismay that the College has struggled and will likely continue to struggle to retain qualified staff due to the need to minimize pay increases (see Component 7), while others highlighted the potential risks that these financial constraints may significantly affect the College's ability to meet the service needs of its diverse student population (CFR 2.10, 2.13).

In every meeting with faculty, administration, and support staff, the team was impressed by the high esteem and deep affection Mills employees feel toward the College in general and students in particular. The College should therefore take measures to ensure these distinguishing attributes of institutional culture and ethos are preserved. Such measures would include focusing on understaffing and the impact of reductions in personnel on retention of faculty, students and staff. The team also

recommends that the College develop and broadly communicate a comprehensive plan for retaining faculty, staff and administrators that includes target goals for regularizing faculty and staffing levels in all campus programs and services, and regularly report progress toward goals to the campus (CFR 3.2). Such a plan should also address issues of equity in staff salaries, especially in relation to the regional standard of living, and evaluate shifts in faculty responsibilities to ensure shifting workload is accurately evaluated (CFR 3.2, 3.4). The team further recommends the College engage in on-going needs assessment of the adequacy of the staffing and technological resources that support accessibility to ensure that Mills College is fulfilling its responsibility to meet the access and service needs of its students, staff, and faculty (CFR 3.1, 3.2, 3.4).

Finally, as the market for online student growth evolves, options for providing quality online education are changing rapidly. Mills cites building out online education as an important facet of its transformative goal of expanding enrollment and bringing the curriculum into the community while acknowledging that online course development and teaching increase faculty and staff workload. The team recommends the College continue to provide faculty with support and comprehensive training in online teaching and learning pedagogies as it expands access and curriculum development through provision of ‘high touch’ and engaged inquiry online and hybrid courses and programs (CFR 3.5; Distance Education and Technology-Mediated Instruction Policy).

Fiscal, Physical, and Information Resources

At a special meeting of the Mills College Board of Trustees held June 2017, Trustees adopted a revised Financial Stabilization Plan (FSP). The revised FSP outlines a path to sustain Mills’ transformative educational opportunities and develop new alliances and programs to balance Mills’ budget within three years. This plan did not succeed. Therefore, the team recommends for the leadership to evaluate and revise further the existing FSP in response to the recognition that the timeline and some key initiatives in

the plan have not been achieved. These revisions should also include building upon aspects of the plan that have yielded positive results (CFR 3.4).

In discussions with the leadership team, it was evident to the team that Mills is using this historical moment as an opportunity to promote cross-functional communication and teamwork. Overall, there is optimism in all levels of the College. While there are issues the College is struggling to address, there were also many initiatives underway to improve systems, procedures, and service to the students, and the team sensed that members of the Mills community are working together to stabilize the College and help bring in a new era of institutional health and vitality. The team commends the commitment on the part of the Mills leadership to foster this institutional cohesion and unity through effective communication, transparency, shared governance, and collegiality that inspires an environment of innovation (CFR 3.6).

The College has established a variety of committees to address key issues, with memberships spanning a wide spectrum of disciplines and including students, faculty and staff. This includes Mills' Faculty Governance Task Force charged with improving and streamlining faculty governance processes; the Graduate Council, consisting of leaders from each graduate program who review new graduate programs and courses according to the data stipulations; and a Budget Committee comprised of 23 members including the President, the College Officers, faculty, staff and students (CFR 3.7). In addition, the president has recruited a talented, visionary, and dedicated leadership team (CFR 3.8).

This year (2019–20) the Board of Trustees of Mills College is composed of 28 voting members, including two trustees emeritus, three alumnae trustees, two recent graduate trustees, the College president, and the president of the Alumnae Association of Mills College (AAMC). There are also eight honorary trustees (non-voting). The Board of Trustees holds six regular meetings during each fiscal year. Standing committees meet off-cycle on an as-needed basis. There are five standing committees of the board: Academic and Student Experience, Audit and Enterprise Risk, Executive, External Engagement, and Resources and Sustainability. During the site visit, the team met with several Board Trustees, all of whom

expressed full support of President Hillman’s administration and are well positioned to assist the institution moving forward (CFR 3.9).

Standard 4: Creating an Organization Committed to Quality Assurance, Institutional Learning, and Improvement

Mills College has sufficient personnel and adequate systems in place to collect, analyze, and interpret data. Key decision-makers are tracking enrollment, retention, and graduation rates, and disaggregating these data based on key demographic characteristics, such as race/ethnicity, first generation and Pell status. The analyses that stem from these disaggregations allow Mills to understand not only the diversity and complexity of their student population but also identify differences in the outcomes for these subgroups. The newly hired Director of the Office of Planning, Analytics and Effectiveness is tasked with helping Mills become a fully data-informed campus by publishing data in forms useful and meaningful by faculty and staff (CFR 4.2, 4.5).

The College informs their strategic enrollment and operational plans with key metrics to set targets and evaluate overall institutional performance (CFR 4.2, CFR 4.6). The College has also invested in visualization tools such as operational dashboards to help review, analyze, and interpret data, and they are developing plans and systems that will help build a culture wherein these analyses and interpretations translate to action and improvement (CFR 4.3). In addition to benchmarking outcomes to peer and aspirational institutions, the College draws upon and uses data from national studies to understand how Mills compares with national enrollment and completion trends (CFR 4.1).

Quality assurance processes are in place at Mills (CFR 4.1, 4.4). While in an emerging stage of development, the College has established systems for assessing student learning and is working toward “closing the loop” to ensure assessment results inform course and program evolution. Mills also has a system for periodic program review and created guidelines based on best practices that promote evidenced-based evaluations of program quality, sustainability, and effectiveness (CFR 2.7, 4. 5).

The College's planning processes appear inclusive, include assessments of social and economic factors affecting higher education and the population that Mills serves, and overall appear well developed. Their improvement initiatives such as MillsNext, MPOWER, and the Financial Stabilization Plan reflect thoughtful, proactive, and creative planning (CFR 4.6). Prior to the visit and at the team's request, the College forwarded a new strategic enrollment (SE) plan detailing key institutional priorities to grow enrollment (CFR 4.6). This plan was well organized and informed by clear and measurable outcomes.

The College also developed a strategic plan spanning 2018-2021: the MillsNext Bridge Strategic Plan. While also detailing initiatives critical to the College's success, MillsNext, unlike the SE plan, references relatively few benchmarks or measurable targets, bringing into question how the College will assess progress meeting their goals. The team encourages the College to consider revising the MillsNext document by incorporating the design principles of its SE plan.

Both the MillsNext Bridge Strategic Plan and strategic enrollment plan are highly ambitious in outlining an extensive array of initiatives they intend to implement, and the team interprets this planning agenda as a sign of Mills' creative response to the challenges they are facing and their commitment to the College's success. However, the team was not clear about: how these many initiatives will be prioritized and sequenced; how, and by whom, they will be led and staffed; and what implementation timeline and benchmarks will be used to evaluate their success. Moreover, given the sheer volume of activity these and other plans will require, the team wonders whether there may be overlap or redundancies among initiatives, or whether they will compete for limited faculty and staff time and energy. While the MillsNext plan was published in 2018, the SE plan was developed over this past spring, so it is unlikely the College has had time to fully consider questions about alignment and prioritization. The team therefore encourages that faculty and administrative leadership consider creating an organizing document that outlines and addresses any planning and logistical conflicts that may constrain the work that the Mills community is intending to pursue over the next few years.

Overall, the team's finding, which is subject to Commission review, is that the institution has provided sufficient evidence to determine compliance with all four Standards of Accreditation.

Component 3: Degree Programs: Meaning, quality and integrity of the degrees

Mills is to be commended for its commitment to students, as well as its effort to rearticulate the meaning, quality, and integrity of its degrees which began in 2013. The college highlights MPOWER, its new First Year Experience, and restructured Division of Student Life as instrumental to this effort. The team explored how a Mills graduate differs qualitatively from graduates of other institutions, i.e., what makes a Mills graduate unique and what are the distinctive experiences and learning outcomes for a Mills student. The team further explored Mills' approach to core competencies and how they fit with the mission, learning outcomes, and campus culture.

Meaning

The meaning of a Mills degree for undergraduates is communicated through the three MillsNext tenets of inclusive excellence, applied and experiential learning, and gender and racial justice, values introduced and reinforced through the new First Year Experience. At the graduate level, the meaning of a Mills degree is found in the College's emphasis on educating for social change, a philosophy and set of practices reflected in the synergies Mills works to facilitate across all its graduate programs.

When asked what makes a Mills degree unique students, faculty, and staff responses were remarkably consistent: a Mills degree 1) embraces social justice values, 2) emphasizes direct access to, and significant 1:1 attention from faculty for students, and 3) provides a rigorous education that serves its students intellectual and career preparation needs within the expansive mission of the College. The uniformity of perception regarding the unique facets of a Mills education for students suggests a vibrant mission-driven culture and set of values that helps imbue campus constituencies with a strong sense of shared identity and purpose.

Quality

While processes are in place to assess the academic programs and curricula for quality, the quality of a Mills degree is reflected in how Mills degrees contribute to the community and through their reported student success rates. Mills cites the MPOWER signature experience, developed between 2016 and 2018, as the most significant evolving expression of a Mills degree. The four components of MPOWER (Academic Success Team, community-engaged learning experience, faculty-mentored project, and embedded career services) are meant to bring coherence to the undergraduate experience in much the same way that the Core Curriculum does, and level the playing field among students with diverse backgrounds and knowledge about how to access academic support and campus-based services. The College's self-study indicated that quality is assured by the integrity and rigor of the processes that Mills has in place to assess student outcomes through internal and external reviews (including state audits of some graduate programs) and via formal program review.

Integrity

The integrity of a degree from Mills lies in consistency of delivery, serving the Bay Area community, ensuring the degrees are serving their intended purpose, and deploying assessment processes that reflect the needs of the student through outcomes, and data-driven improvements. In Fall 2018 Mills initiated a dashboard project to provide the campus with real-time Key Performance Indicator data and began using Handshake to gather feedback on students from employers that allow external stakeholders to see how educational goals are being achieved. The newly restructured Planning, Analytics and Effectiveness team has identified consistent use of analytics and facilitating a truly data informed culture as a primary focus for its first year.

The Division of Student Life is tasked with, among other things, developing and cultivating attitudes and values among students consistent with the Mills mission and academic degree goals. Student Life leadership and staff are deeply rooted in these values, while their programs are fully

integrated with the educational mission of the College. The team noted favorably that Student Life staff feel empowered to exercise their judgment in identifying and testing initiatives they believe may improve students' experiences at Mills.

Component 4: Educational Quality: Student learning, core competencies, and standards of performance at graduation

Educational Quality: Student Learning, Core Competencies, and Standards of Performance at Graduation (CFR 2.2, 2.4, 2.6, 2.7, 4.3)

Mills has expended considerable effort to build a learning outcomes culture across campus. This effort has included identifying, articulating, refining, and assessing key learning outcomes for undergraduate and graduate students through a comprehensive alignment project meant to produce more effective assessments of Institutional Learning Goals (ILGs). By assessing program learning outcomes in students' capstone course portfolio submissions, Mills has sought to determine the degree to which mastery levels have been accomplished. In its spring 2019 Assessment Plan, Mills reports that their Assessment Committee of five faculty members and the Associate Provost for Teaching, Learning, and Faculty Affairs determined that 11 ILGs need to be rearticulated again in order to distinguish Core Curriculum from institutional learning goals and more directly address graduate programs for which Core Curriculum goals are not relevant. This work demonstrated to the team that Mills is learning from their experience to develop and improve further their program for student learning assessment.

As Mills' self-study notes, and the team confirmed during its campus interviews, faculty have not had the tools necessary to embrace fully their collective responsibility for academic quality and assessment that links student work to measurable course and program learning outcomes (CFR 2.3, 2.4, 2.7). For example, rather than leverage the reporting functions of the institution's robust learning management system, outcomes data have been reported via superficial aggregate analysis. The self-study further suggests that while Mills has not yet developed a comprehensive evidence-based assessment

culture, the launching of the Center for Teaching and Scholarship is an important step toward reaching that goal.

Since its inception in 2016, the Center for Teaching and Scholarship has offered teaching and assessment workshops attended by 54 faculty members—roughly 45% of the total faculty. And as it continues to rely increasingly on adjunct teaching staff, Mills is putting effort into adjunct faculty development through its Adjunct Inclusion Initiative and is currently seeking extramural funds to assist with this effort. Team meetings with faculty (including adjuncts) suggest that the effort to expand moderately and regularize adjunct faculty roles has had a positive impact on the job satisfaction and workload of adjunct faculty. Both Mills' leadership and faculty expressed optimism to team members that the teaching load goal of 50% tenure track and 50% adjunct will be met and will bring faculty workload to a more sustainable balance across programs.

The spring 2019 Assessment Plan notes a newly developed program learning outcomes project to revisit and redesign program outcomes by reviewing current learning goals and revising them into outcomes that are clear, measurable, and observable, with roughly 80% of Mills programs revising their goals into outcomes to date. Additionally, Mills has made some progress implementing benchmark and disaggregated data to better understand and identify unique student needs and address any gaps in achievement among groups and individuals (CFR 2.10, 4.1).

Component 5: Student Success: Student learning, retention, and graduation

Mills defines student success in relation to graduating students who are prepared to fulfill the college's mission and measures that success through retention and graduation rates, average time to degree, assessment of institutional learning goals, student surveys, and (beginning with the 2020 graduating class) ePortfolios. Mills' six-year graduation rate (for all first-time first-year students) is 71%, with 79% of first-generation and 71% of students of color achieving a degree within six years. While the percentage of first-generation and students of color graduating from Mills within six years exceeds the

national average, the overall graduation rate falls below the expected graduation rate of 74.5% calculated by the Higher Education Research Institute. It also lags behind that of peer and aspirant institutions. One possible factor contributing to the data can be found in the results of the 2017 Diverse Learning Environments Survey, which indicated that 62% of the sophomore and junior respondents from Mills had psychological challenges, compared to 29% from similar institutions (CFR 2.10, 4.3)).

Nevertheless, Mills' first-year bachelor-degree-seeking cohort of Pell recipients and first-generation students are retained at the same or higher rate as that of the overall population, 80% and 76%, respectively. Further, students of color return at a higher rate, 79%, than the overall population. The six-year graduation rate of first-generation students and Pell recipients is equal to or higher than the overall rate, and the six-year graduation rate for first-year students of color is equal to the overall rate.

Mills' commitment to improving retention and graduation rates, grounded in allegiance to educational equity, is visible in a variety of robust programs designed to promote student success (CFR 2.11, 2.13). These include Summer Academic Workshop; the Hellman Summer Science and Math Fellows Program; Being the First Programming for first-generation students; academic support services such as peer tutoring, academic navigators and academic coaching; a First-Year Experience that contains a First-Year Seminar, a Rhetoric and Composition Curriculum, and the use of ePortfolios.

In spring 2016, the Retention, Academic Success and Advising (RASA) Committee was formed and charged with developing a comprehensive, coordinated, holistic and data-informed approach to student academic success and improving retention, graduation and post-graduation placement. The committee identified four primary areas of concern—physical and mental health challenges, financial challenges, campus climate/sense of belonging and academic issues. Their research revealed the need to provide a more integrated approach to student support services, resulting in the creation of an Office of Advising, Careers and Global Learning, and several new administrative positions, including the Director of Undergraduate Advising (subsequently replaced with Assistant Dean of Advising, Careers and Global

Learning), Associate Provost for Recruitment and Student Success, Dean of Graduate Studies and Assistant Director of International Scholars and Global Learning (CFR 2.11, 2.13).

Other initiatives involved the reorganization of the academic advising and support center (CFR 2.12). These included overhauling advising practices by focusing on the creation of an advising syllabus; training faculty in appreciative advising and student-ownership of academic planning; enhanced processes to support access to global learning opportunities; institutional emphasis on student social belonging, through the First-Year Experience, high-impact educational practices and a shared intellectual experience; and the MPOWER signature experience, which focuses on four areas of student success: academic advising, community engaged learning, signature work through a faculty mentored project, and career engagement throughout the curriculum.

Each annual academic program review across the college now includes a prompt to “describe the efforts taken to attract, retain and graduate students from underserved communities, students with disabilities and first- generation students” and to “offer an evaluation of these efforts and describe your future plans.” A report from the Provost’s Office evaluating the responses was scheduled for spring 2019. Graduate programs are also analyzing student data in relation to equity and inclusion goals.

Building on evidence-based research from data gathered by the RASA Committee, Mills has started several new initiatives aimed at enhancing student success. These include a Drop, Failure, Withdrawal (DFW) analysis of gateway courses, revision of the Academic Alert System, academic probation process and leave of absence and withdrawal processes. A spring 2019 Faculty Meeting was used to strategize about interventions in support of student success.

The College adopted a process of Appreciative Advising and implemented the advising tool DegreeWorks, which enables students to track their progress toward degrees. Mills joined the Associate Degree for Transfer initiative as a means of better supporting the transfer student body. An overarching Advising Center was established in fall 2018 as a hub for student success.

In response to the growing percentage of students requesting accommodations and the high demand for psychological counseling services, the Mills leadership conducted a satisfaction survey examining students' attitudes toward disability and counseling services. This led to recommendations to the president to provide better customer service training for staff with an emphasis on issues of diversity and access and to bolster opportunities for increasing financial literacy.

Component 6: Quality Assurance and Improvement: Program review, assessment, use of data and evidence

Mills College continues to make progress developing efficient and effective systems that lead to improvement in teaching and student learning, ensuring program viability and educational effectiveness, and promoting organizational learning.

Assessment

The College has worked to develop an institutional culture that values and invests in assessment as a means to ensure educational quality (CFR 4.1, 4.3). Evidence of their progress in this work includes an extensive, intensive, and ongoing effort involving multiple stakeholders to align institutional learning goals (ILGS) with core, curricular, and co-curricular learning outcomes; expanding and refining assessment protocols; developing comprehensive plans to implement a coordinated and integrative assessment program, and most importantly building capacity to conduct ongoing student learning assessment. The College's Assessment Committee has also established a more manageable timeline to do annual assessment research that should produce valuable insights about student learning, but more importantly will be used regularly to improve curriculum and pedagogy and inform academic program reviews.

The newly configured Assessment Committee (AC) reflects Mills' decision to move away from a centralized reporting system, which had been led by the former Director of IR, Assessment, and Planning. Since the 2017-18 academic year, the College has adopted a decentralized yet coordinated model led by faculty who serve as divisional Program Assessment Liaisons and provide faculty support for doing

assessment (CFR 4.4, 4.5). This Committee also includes co-curricular representatives who play a supporting role. As one committee member aptly explained, the AC now serves as a hub with members serving as spokes that support the wheel of assessment activity. They report that faculty knowledge and understanding about assessment is expanding as a result of the direct support they are receiving from AC liaisons, and that this new model is helping faculty assume greater ownership of this work.

The AC expressed their commitment to build and facilitate an efficient and effective system for assessment through its new decentralized model. The team came away with a clear impression that Mills has the proper leadership in place to fulfill this commitment. In addition to the Associate Provost for Teaching, Learning, and Faculty Affairs, who now assumes the role of de facto leader of assessment at Mills, the AC will also benefit from the input and guidance of Mills' new Director of Planning, Analytics, and Effectiveness (PAE) and Analyst & Assessment Coordinator.

The College has also made strides in assessment planning. Prior to the visit and at the request of the team, Mills submitted a comprehensive plan to assess the College's institutional, program, and core curriculum goals and outcomes. The team found this plan informative and provided evidence that the College has a clear concept of what an aligned and coordinated system for measuring and evaluating student learning will look like. However, while this plan provides a clear summary of meaningful activity to move towards establishing such a system, the document itself lacked elements of a formal plan, such as specific assessment activities, timelines with set target dates that outline the sequencing of activities, designated roles and assignments, and expected deliverables. The College is encouraged to build upon the thoughtful work that went into the production of this document by incorporating these specifics into their comprehensive plan (CFR 4.6).

The Assessment Committee (AC) will play a critical role in ensuring Mills has a functional and effective system for assessment. They have begun this work recently by commencing a major project led by the Associate Provost for Teaching, Learning, and Faculty Affairs and the Associate Provost for

Curriculum to translate all program goals into measurable and observable outcomes. This revision project will serve as the basis for a program-wide assessment they are planning for the current academic year.

At the same time, it was also clear to the team that the committee has much work to do over the next few years both to operationalize fully their plans and to make any needed course corrections along the way. The AC will play a critical role, for example, not only in supporting assessment planning but helping programs interpret, make meaning of, and use their assessment results to improve teaching and learning, i.e., 'closing the loop'. The need for such analytical support was clearly evident in the assessment reports Mills submitted with their self-study and those forwarded to the team following the Off-Site Review. These reports were outputs of their assessment software (Aqua) that provided assessment results but no analysis or interpretation of what these results mean to the College. In addition, it was not at all evident to the team how faculty are using results, which raised concerns among the team that Mills' system for assessment remained open-ended and not supporting ongoing curricular and pedagogical improvement.

These observations underscore the critical role of the AC not only to help conduct assessment research that produces results but also to help faculty interpret and act upon these results. The team recommends that the Assessment Committee develop a simple report template structured in such a way that prompts faculty to think about the meaning of the results (i.e., do the overall results indicate students are proficient with a given learning outcome) and how they may be used to improve teaching and learning.

In addition, the team also considers it critical that the AC receive ongoing training in both technical and analytical support in order to build assessment capacity (CFR 3.3). While some AC members have assessment expertise and the committee as a collective is playing a key role in providing direct support to programs, the committee has yet to implement ongoing assessment training. The need for such training will become even more important as staff and faculty rotate into and out of the committee over time.

Use of Data and Evidence

In the institutional self-study and various documents and reports submitted to the team following the Off-Site Review, Mills demonstrated their commitment to using institutional data to support and inform decision-making, planning and improvement (CFR 4.1, 4.2, 4.3). A clear example of this commitment is evident in the work of the Retention, Academic Success, and Advising (RASA) Committee, who were tasked with developing, “a comprehensive, coordinated, holistic and data-informed approach to student academic success, degree completion, and postgraduate placement including advising, first-year and transfer experiences, and academic and co-curricular programming and support” (p. 41). Using institutional data from various sources, the committee implemented a number of important initiatives to help achieve these indicators of student success.

In their analysis of their Inventory of Educational Effectiveness Indicators (IEEI) report, the College identified opportunities to enhance their assessment practices by adding indirect measures of student learning and adding formative assessments to supplement their use of summative assessments of student learning (i.e., senior capstones). The College also pays close attention to external trends affecting enrollment, such as declining high school graduates, changing student demographics, and the emerging crisis of student loan debt, all of which are factoring into their planning and decision-making. In addition, the College regularly conducts surveys to measure and assess student satisfaction, sense-of- belonging, and overall well-being and uses these data to address factors affecting student success. In doing so, Mills demonstrates their commitment to achieving the institutional goals of promoting access, inclusivity and equity (CFR 4.7).

Mills is also building capacity for using evidence for decision-making by leveraging their in-house professional experience (CFR 4.2). For example, Mills recently hired a new Director of Planning, Analytics, and Effectiveness (PAE) who as noted previously serves on the College’s Assessment Committee. In addition to supporting the work of ‘closing the loop’ through assessment research, he also communicated

to the team his plans to work more directly with faculty interpreting their program review data profiles (CFR 2.7). This work may also be supported through the forthcoming hire of the Analyst & Assessment Coordinator who will work with the Director in the newly established Office of Planning, Analytics, and Effectiveness (PAE).

Lastly, Mills has outlined a plan to enhance institutional practices to provide and use data for planning and decision-making (CFR 4.2). In this plan, Mills intends to move its research and decision-support process away from a static “service” model, where data are simply provided to stakeholders, and toward a dynamic model in which PAE leadership engages and educates decision-makers about the meaning of data and provides more visualization tools that facilitate interpretation. These and other measures will help create a data-literate culture that uses data regularly to develop plans and make decisions.

Program Review

Mills programs appear to be in general compliance with the College requirement to complete periodic academic program reviews (CFR 2.7). The team’s review of Mills Inventory of Educational Effectiveness Indicators (IEEI) shows that eight programs had not completed a review since 2011 or earlier, although five of these programs had a review scheduled this academic year or early next year. The team encourages the College to monitor its review schedule and make regular updates to its IEEI report to ensure programs are staying on schedule to complete their periodic reviews.

Mills recently developed new guidelines for writing program review self-studies based on the WSCUC Resource Guide for ‘Good Practices’ in Academic Program Review. These guidelines serve as prompts that invite faculty to reflect on various aspects of curriculum, program capacity, infrastructure, and educational effectiveness. In response to the team’s request, the College provided two program reviews self-studies that followed these new guidelines along with reports from external reviewers. One of these self-studies, produced by the Economics program, may serve as an exemplar not only of how to

engage critically with the review questions concerning curriculum, pedagogy, and learning, but also how to support claims about program quality and effectiveness through the use of evidence. More specifically, this particular self-study reflection of educational effectiveness was exemplary for its analysis and use of assessment results. In this review, faculty referenced assessment research that measured student proficiency with the program learning outcomes, provided detailed summaries of what they learned from this research, and identified specific opportunities to address areas where student learning can improve. The team encourages Mills to use this particular self-study as a model for how best to respond to the review criteria and produce reflective, evidenced-based evaluations of program quality and educational effectiveness.

Program review will also benefit from the work of the Associate Provost for Teaching, Learning, and Faculty Affairs, who plans to review and provide feedback to drafts of program self-studies. In addition, the College reports that the new Director of PAE intends to augment the program data profile used in the self-studies and assume a greater role in engaging faculty in conversations about the meaning of these data. These plans, to provide such attention and expertise, assured the team that the College recognizes program review as a critical part of its overall system for quality assurance.

Component 7: Sustainability: Financial viability, preparing for the changing higher education environment

Mills furnished a narrative of its financial situation in the institutional report, as well as supplemental documents that included financial statements for FY2015, FY2016 and FY2017. The institution's US Department of Education Composite Score has been in the "Financially Sound" range (1.5 to 3.0) for the past several years with scores between 2.2 and 2.8. The team met with the College's auditors who identified no flags for significant issues. Systems, policies and procedures, and personnel were adequate to support the College. Mills has a substantial endowment valued at \$191.3 million at 6/30/18 of which \$148.6 million represents the corpus of the endowment, and approximately \$28 million

bonds payable. Therefore, the financial ratios appear very healthy. (e.g., debt to equity is 0.2). However, the team was concerned to note the College's FY2020 Budget depends upon a significant deficit of \$5,977,000. Fall 2019 enrollment did not meet budget targets, so the FY2020 financial performance is stressed even further. Therefore, the College continues to depend on reserves to fund operations. At the end of FY2018, Mills had appx \$42.7 million over the corpus of the endowment. If the market continues to perform well, there are sufficient reserves to support operational deficits for several years. (CFR 3.4)

Endowment Review

Year	Beginning Corpus Value	Net Additions to Corpus	Ending Corpus Value	Market Value	Gains / (Losses) (excludes Changes to Corpus)	Mkt Value Percent G/(L)	Over / (Under) Corpus (Surplus)	Surplus Percent Gain / (Loss)
FY2018	144,769,022	3,812,079	148,581,101	191,278,617	4,191,682	2.3%	42,697,516	10%
FY2017	141,751,490	3,017,532	144,769,022	183,274,856	9,268,439	5.4%	38,505,834	24%
FY2016	140,403,635	1,347,855	141,751,490	170,988,885	(13,082,082)	-7.2%	29,237,395	-45%
FY2015	138,781,771	1,621,864	140,403,635	182,723,112	(8,187,029)	-4.3%	42,319,477	-19%
FY2014			138,781,771	189,288,277			50,506,506	
Totals	138,781,771	9,799,330	148,581,101	183,510,749	(7,808,990)	-4.3%	(7,808,990)	-15.5%
				Average Value	Appx 4 Year Loss		Appx 4 Year Loss	

Note: **Factors from Beginning Corpus Value to FY2018 Market Value of \$191,278,617**

The \$7.8 million 4-year loss is due to market performance, & to appropriations to support Mills operations

As described in the Institutional Report (p. 58), Mills College has incurred operating losses for five of the past eight years (FY11 to FY18). This is attributable to a combination of decreasing enrollment, the implementation of new bequest guidelines, and a deliberate reduction in the endowment payout rate from 7% to 5%, while maintaining a fairly consistent operating expenditure baseline (non-compensation). During this same period, total average annual enrollment has decreased approximately 20% from 1,467 FTEs to 1,174 FTEs, with declines in undergraduate students from 894 to 721 FTEs and graduate students from 573 to 453 FTEs. There is a structural disconnect when tuition (representing 60% of revenue) is declining 20%, but expenditures are maintaining a fairly consistent baseline. One method to maintain the expenditure baseline has been to minimize pay raises; there has been no general pay increase since 2012 (CFR 1.6), but this approach will have increasingly deleterious impacts if it is maintained. As mentioned above, Mills has the resources to maintain a structural deficit for several years.

Mills' gross revenue budget for FY19 is \$60 million (Institutional Report, p. 63). Approximately 60% of this revenue is from tuition and fees; 13% is from room and board; 14% is realized from its endowment income; and 13% comes from its annual funds and other auxiliary revenues. The team recommends that the College create a consolidating report providing a full statement of activity for each revenue stream. Such a summary report would help leadership assess the performance of each line of business, and will provide stakeholders a clear picture of Mills' financial status.

At a special meeting of the Mills College Board of Trustees held June 2017, Trustees adopted a revised Financial Stabilization Plan (FSP). The revised FSP outlines a path to sustaining Mills' transformative educational opportunities and developing new alliances and programs to balance Mills' budget within three years. This plan did not succeed.

The revised FSP set out the following nine measures to achieve a balanced institutional budget:

1. Reducing staff and implementing a hiring freeze for non-critical positions;
2. Reducing non-salary operating expenses;
3. Temporarily reducing 403(b) contributions beyond January 1, 2017 reductions;
4. Taking actions to increase revenues;
5. Reorganizing the administration and staffing of academic programs to reduce redundancies, streamline administrative costs, and support growth areas;
6. Modifying some academic programs and eliminating some programs;
7. Directing resources toward, and thereby strengthening, the academic programs in which we seek growth;
8. Modifying faculty salary steps;
9. Investing in faculty professional development and staff development and retention incentives.

The leadership team has been stable for the past two years, and they are motivated to think creatively to improve the College's financial condition. There are many initiatives (financial, academic, IT systems, etc.) that show promise, and there are several encouraging ideas to increase revenue and optimize Mills' undeveloped real estate. The efforts to build strategic partnerships are both exciting (as they bring additional resources for the students) and rewarding (as the financial situation improves

through ongoing additional revenue). In addition, Mills continues to explore pipeline opportunities to increase student FTEs both locally and internationally.

The team felt Mills meets the basic conditions for all of the financial indicators listed in CFR 3.4. However, the underlying and potentially countervailing factor remains the College's dependence on operational deficits, as this will continue to erode the financial health of the College over time.

Component 9: Reflection and plans for improvement

The College identified a number of conclusions and key findings that stem from the reflection and action planning informing the institutional self-study and accreditation report. These include building on the core ideas outlined in their strategic plan, developing new initiatives which they believe will build upon the historical strengths of the College, continuing their work of addressing their financial challenges, and building on the progress they have made in improving their curriculum and assessment systems.

SECTION III – OTHER TOPICS (such as Substantive Change)

(Approximately 5-10% of the report, 2-4 pages, if there are important issues not addressed elsewhere in the report)

Not applicable

SECTION IV – FINDINGS, COMMENDATIONS, AND RECOMMENDATIONS

(Approximately 5-10% of entire report, 2-4 pages)

Commendations

1. A dedicated faculty and staff who further Mills' mission through active and creative engagement in promoting student success at both the undergraduate and graduate levels.
2. A commitment on the part of the Mills leadership to institutional cohesion and unity through effective communication, transparency, shared governance and collegiality that inspires an environment of innovation.
3. Grounded in an equity-minded approach, Mills effectively employs evidence-based research and disaggregated data to advance the college's mission.
4. Mills has embarked on systematic efforts to increase retention and completion that are responsive to the changing demographics in higher education and align with the college's mission.

5. Mills is making steady progress toward aligning learning outcomes and expanding and refining assessment protocols.
6. Mills has made significant strides in identifying alternative sources of revenue, such as land resources, IP addresses and other internet resources.
7. Mills is dedicated to serving as an anchor institution, demonstrating that the success of the college is linked inextricably to the health, economic and educational well-being of the surrounding communities.
8. Mills social justice mission is enhanced by its achieving status as a Hispanic Serving Institution.

Recommendations

1. Evaluate and revise the existing Financial Stabilization Plan in response to the recognition that the timeline and some key initiatives in the plan have not been achieved, and building upon aspects of the plan that have shown positive results (CFR 3.4)
2. Engage in on-going needs assessment of the adequacy of the staffing and technological resources that support accessibility to ensure that Mills College is fulfilling its responsibility to meet the access and service needs of its students, staff, and faculty (CFR 1.4, 2.13, 3.1, 3.2, 3.4, Equity and Inclusion Policy)
3. Focus on issues of understaffing and the impact of reductions in personnel on retention of faculty, students and staff, developing and communicating a comprehensive plan for retaining faculty, staff and administrators that includes target goals for regularizing faculty and staffing levels in all campus programs and services, and regularly report progress toward goals to the campus. (CFR 3.1)
4. Ensure student retention efforts are regularly and thoroughly assessed and data are being used to improve retention outcomes. (CFR 2.10, 2.11, 2.13, 4.1)
5. Address issues of equity in staff salaries, especially in relation to the regional standard of living, and evaluate shifts in faculty responsibilities to ensure shifting workload is accurately evaluated. (CFR 3.2, 3.4)
6. Advance progress toward a comprehensive assessment initiative, spanning the curriculum and co-curriculum, that utilizes data for continuous improvement and includes a training plan for faculty and academic staff, and delineates lines of responsibility among Planning, Analytics and Effectiveness leadership. (CFR 2.7, 4.1, 4.2)
7. Continue to expand access and curriculum development through expansion of robust online programs and by providing faculty with comprehensive training in online teaching and learning pedagogies. (CFR 3.5; Distance Education and Technology-Mediated Instruction Policy)

APPENDICES

The report includes the following appendices:

- A. Federal Compliance Forms
 1. Credit Hour and Program Length Review
 2. Marketing and Recruitment Review
 3. Student Complaints Review
 4. Transfer Credit Review
- B. Off-Campus Locations Review, as appropriate
- C. Distance Education Review, as appropriate

1 - CREDIT HOUR AND PROGRAM LENGTH REVIEW FORM

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

Material Reviewed	Questions/Comments (Enter findings and recommendations in the Comments sections as appropriate.)
Policy on credit hour	Is this policy easily accessible? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
	If so, where is the policy located? On the campus intranet, in the Provost Area
	Comments: This policy is not publicly available, must access intranet to view
Process(es)/ periodic review of credit hour	Does the institution have a procedure for periodic review of credit hour assignments to ensure that they are accurate and reliable (for example, through program review, new course approval process, periodic audits)? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
	If so, does the institution adhere to this procedure? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
	Comments: The new course approval process requires that faculty justify the number of credit hours.
Schedule of on-ground courses showing when they meet	Does this schedule show that on-ground courses meet for the prescribed number of hours? <input type="checkbox"/> YES <input type="checkbox"/> NO
	Comments:
Sample syllabi or equivalent for online and hybrid courses <i>Please review at least 1 - 2 from each degree level.</i>	How many syllabi were reviewed? 6
	Type of courses reviewed: <input checked="" type="checkbox"/> online <input checked="" type="checkbox"/> hybrid
	What degree level(s)? <input type="checkbox"/> AA/AS <input checked="" type="checkbox"/> BA/BS <input type="checkbox"/> MA <input type="checkbox"/> Doctoral
	What discipline(s)? education +
	Are students doing the amount of work per the prescribed hours to warrant the credit awarded? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
Sample syllabi or equivalent for other kinds of courses that do not meet for the prescribed hours (e.g., internships, labs, clinical, independent study, accelerated) <i>Please review at least 1 - 2 from each degree level.</i>	How many syllabi were reviewed? n/a
	What kinds of courses?
	What degree level(s)? <input type="checkbox"/> AA/AS <input type="checkbox"/> BA/BS <input type="checkbox"/> MA <input type="checkbox"/> Doctoral
	What discipline(s)?
	Are students doing the amount of work per the prescribed hours to warrant the credit awarded? <input type="checkbox"/> YES <input type="checkbox"/> NO
Sample program information (catalog, website, or other program materials)	How many programs were reviewed? All available program reviews
	What kinds of programs were reviewed? academic
	What degree level(s)? <input type="checkbox"/> AA/AS <input checked="" type="checkbox"/> BA/BS <input checked="" type="checkbox"/> MA <input type="checkbox"/> Doctoral
	What discipline(s)? social and behavioral sciences, business, natural sciences
	Does this material show that the programs offered at the institution are of an acceptable length? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO

2 - MARKETING AND RECRUITMENT REVIEW FORM

Under federal regulation §602.16(a)(1)(vii), WSCUC is required to demonstrate that it monitors the institution's recruiting and admissions practices.

Material Reviewed	Questions and Comments: (Enter findings and recommendations in the Comments sections of this table as appropriate.)	
**Federal Requirements	Does the institution follow federal requirements on recruiting students?	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
	Comments:	
Degree completion and cost	Does the institution provide information about the typical length of time to degree?	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
	Does the institution provide information about the overall cost of the degree?	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
	Comments: The team did not find any webpage that reported expected time to degree. Also, the Net Price Calculator only provides information on Presidential Scholarship funds available to incoming students. While Mills provides a web page detailing tuition costs for 2019-20, they do not provide an estimate for the overall cost of the degree. Both items should have dedicated web pages and be included in their list of links located on the webpage titled <i>Consumer Information Details</i> .	
Careers and employment	Does the institution provide information about the kinds of jobs for which its graduates are qualified, as applicable?	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
	Does the institution provide information about the employment of its graduates, as applicable?	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
	Comments:	

**Section 487 (a)(20) of the Higher Education Act (HEA) prohibits Title IV eligible institutions from providing incentive compensation to employees or third party entities for their success in securing student enrollments. Incentive compensation includes commissions, bonus payments, merit salary adjustments, and promotion decisions based solely on success in enrolling students. These requirements do not apply to the recruitment of international students residing in foreign countries who are not eligible to receive Federal financial aid.

3 - STUDENT COMPLAINTS REVIEW FORM

Under federal regulation*§602-16(1)(1)(ix) WSCUC is required to demonstrate that it monitors the institution's student complaints policies, procedures, and records.
(See also WSCUC Senior College and University Commission's Complaints and Third Party Comment Policy.)

Material Reviewed	Questions/Comments (Enter findings and recommendations in the Comments sections of this table as appropriate.)	
Policy on student complaints	Does the institution have a policy or formal procedure for student complaints?	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
	Is the policy or procedure easily accessible? If so, where? Mills internet; www.Mills.edu/Policies/Index.php	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
	Comments: (A) Student Privacy Rights: www.mills.edu/policies/student-privacy-rights.php (B) ADA Policies: www.mills.edu/policies/ada-policies/index.php (C) Whistleblower Reporting www.mills.edu/policies/whistleblower-reporting.php (D) A Student Guide to Concerns, Complaints, and Grievance (E) Various instructions: www.mills.edu/policies/docs/mills-college-student-handbook.pdf	
Process(es)/ procedure	Does the institution have a procedure for addressing student complaints? If so, please describe briefly See Student Handbook, pages 76-85	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
	If so, does the institution adhere to this procedure?	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
	Comments: There are a wide assortment of policies and processes on the internet, and documented in the Student handbook and/or the Annual Campus Security Report.	
Records	Does the institution maintain records of student complaints? If so, where? Annual Campus Security Report	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
	Does the institution have an effective way of tracking and monitoring student complaints over time? If so, please describe briefly: See Annual Campus Security Report, pages 35-48, for three year review.	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
	Comments: https://inside.mills.edu/student-life/safety-transportation/public-safety-resources/docs/2018-Annual-Public-Safety-Security-and-Fire-Report_Final.pdf	

4 – TRANSFER CREDIT REVIEW FORM

Under federal requirements*, WSCUC is required to demonstrate that it monitors the institution’s recruiting, transfer, and admissions practices accordingly.

Material Reviewed	Questions/Comments (Enter findings and recommendations in the Comments sections of this table as appropriate.)
Transfer Credit Policy(s)	Does the institution have a policy or formal procedure for reviewing and receiving transfer credit? xYES <input type="checkbox"/> NO
	If so, is the policy publicly available? xYES <input type="checkbox"/> NO
	If so, where? The policy is published in the Mills College Undergraduate and Graduate Catalogs online. Does the policy(s) include a statement of the criteria established by the institution regarding the transfer of credit earned at another institution of higher education? xYES <input type="checkbox"/> NO
	Comments: