
3E

Action

Educator Preparation Committee

Initial Institutional Approval – Change of Control and Name for Brandman University to University of Massachusetts Global

Executive Summary: This agenda item presents information about a change of control and name for Brandman University, a Commission-approved program sponsor, to the University of Massachusetts (UMass) Global.

Recommended Action: Staff recommends that the Commission continue the approval of Brandman University as a program sponsor under the name UMass Global.

Presenter: Cheryl Hickey, Administrator, Professional Services Division

Strategic Plan Goal

II. Program Quality and Accountability

- b) Effectively and efficiently monitor program implementation and outcomes and hold all approved educator preparation programs to high standards and continuous improvement through the accreditation process.

Initial Institutional Approval – Change of Control and Name for Brandman University to University of Massachusetts Global

Introduction

This agenda item presents information about a change of control and name for Brandman University, a Commission-approved program sponsor, to the University of Massachusetts (UMass) Global and seeks approval from the Commission to continue as a Commission-approved program sponsor.

Background

Brandman University has been an independent Commission-approved program sponsor since 2009, however its history in this state and in educator preparation date back much further and is somewhat complex. Brandman University grew out of Chapman University which itself was established in Orange, California in 1861. Chapman University was first accredited by the Western Association of Schools and Colleges (WASC) Senior College and University Commission in 1956. Chapman maintained additional campuses including on military bases in order to deliver programs to adult learners in these locations. Over the years as the institution continued to offer off-campus educational programs; these sites became distinguished from Chapman University by the name University College of Chapman University (UCCU). Chapman University began to identify a new strategic direction that would study, then seek to establish, its off-campus sites as a separately accredited unit of the Chapman University system.

In February 2007, the WASC Senior Colleges and University Commission approved a structural change that established University College of Chapman College as separately accredited from Chapman University, in part to distinguish its educational offerings of the satellite campuses focused on adult learners from those of the more traditional offerings at its Orange, California campus. The off-campus satellite programs were renamed Brandman University. Having separate and distinct WASC accreditation from its original parent educational institution was the catalyst for Brandman to seek Commission approval as an independent program sponsor. At its June 2009 meeting, the Commission granted Brandman University institutional approval as an independent institution.

Although Chapman and Brandman sought and received separate WASC accreditation and operated independently of one another, Brandman continued to be considered as part of Chapman's system of schools. The Brandman bylaws approved by WASC allowed Chapman the authority to appoint the majority (greater than 50 percent) of the members of the Brandman Board of Regents.

Brandman University is currently approved to offer the following credential programs:

- Preliminary Administrative Credential Program
- Clear Administrative Credential Program
- Preliminary Education Specialist Early Childhood Special Education, with Intern
- Preliminary Education Specialist Mild to Moderate Disabilities, with Intern
- Preliminary Education Specialist Moderate to Severe Disabilities, with Intern
- Education Specialist Added Authorization Autism Spectrum Disorders
- Education Specialist Added Authorization Early Childhood Special Education
- Preliminary Multiple Subject with Intern
- Pupil Personnel Services School Counseling with Intern
- Pupil Personnel Services School Psychology with Intern
- Preliminary Single Subject
- California Teachers of English Learners (CTEL)

At this time, there are nearly 2,700 candidates enrolled in credentialing programs at Brandman University.

Brandman University is in good standing with the Commission. Its last accreditation visit took place in 2015 and the institution received full accreditation from the Committee on Accreditation. That site visit was a joint Commission - National Council for the Accreditation of Teacher Education (NCATE) site visit and Brandman earned its initial NCATE Accreditation. Since that time, Brandman University has participated in all expected accreditation activities.

Current Developments

The Commission's General Precondition # 1, included below, requires institutions to notify the Commission when the institution's regional accreditation status changes.

General Precondition (1) Accreditation and Academic Credit. The program(s) must be operated by (a) Institutions of higher education: A college or university that (i) is fully accredited by the Western Association of Schools and Colleges or another of the six regional accrediting associations, and (ii) grants baccalaureate academic credit or post baccalaureate academic credit, or both. An institution approved to offer educator preparation in California must notify the Commission within 30 days if its regional accreditation status changes.

In November 2020 and in accordance with General Precondition #1, Commission staff was notified by Brandman University's Chancellor and CEO Gary Brahm that it had sent forward to the WASC Senior Commission a request for approval of a substantive change that included a Change of Control of Brandman from Chapman University to the University of Massachusetts. WASC defines a substantive change as a change in mission, ownership, legal status, or control.

On November 12, 2020 WASC Senior College and University Commission approved the substantive change request. Staff attempted to gather information from WASC to better understand the implications of that change to Brandman's WASC approval. However, because WASC's information was confidential until it was officially disclosed, the Commission staff could

not receive additional information at that time. On November 24, 2020 Chancellor Brahm of Brandman provided the Commission with a copy of the official WASC letter which is included as [Appendix D](#). In his correspondence he indicated the following:

Note that while the control of Brandman University is being transferred from Chapman University to the University of Massachusetts, Brandman is and will continue to operate administratively and academically as an independent non-profit university with its own operating policies, academic faculty, and staff. In other words, Brandman is not transferring its authority, or its educator licensure programs, to the University of Massachusetts. The entity of Brandman University will continue to sponsor the educator licensure programs both before and after the transaction, though we do anticipate that Brandman University changing its name to UMass Global. However, UMass Global will not be part of the University of Massachusetts system nor a campus of the University of Massachusetts.

On December 18, 2020 Commission staff met with leadership at Brandman to ensure an accurate understanding of the changes and to consider the implications for the institution as UMass is not currently a Commission-approved institution. Staff has held subsequent meetings with Brandman staff to ensure an accurate understanding of the implications of this substantive change. [Appendix A](#) of this item, *Commission UMass Global Transition Document*, provides contextual information about the change from Brandman University to UMass Global including the desire to pursue “strategic partnership opportunities” as a primary rationale and impetus for the change.

Currently the changes are scheduled to take effect sometime in mid-March 2021. The institution is awaiting approval by the US Department of Education after which the name will formally change to UMass Global.

Summary of Changes from Brandman University to UMass Global

As explained above, Brandman University has been affiliated with Chapman University although both institutions are separately WASC accredited, each independently operated, and each holds approval from the Commission to sponsor educator preparation programs. However, Chapman had maintained the authority, within Brandman’s bylaws, to appoint the majority of the seats on the Brandman Board of Regents.

The structural change approved by WASC in 2020 for Brandman University is comprised of two basic changes: 1) a change of the composition of the Board of Regents, and 2) a change in affiliation from Chapman University to University of Massachusetts which will result in a name change to UMass Global.

Change of Control

Name Change and Affiliation

The structural change is not a merger nor acquisition by the University of Massachusetts, but rather a new affiliation. Under its new name, UMass Global, will remain a WASC Senior College and University Commission (WSCUC) accredited nonprofit institution headquartered in Irvine,

California. Its affiliated institution, the University of Massachusetts, remains separately accredited by the New England Commission of Higher Education (NECHE).

Impact on Commission on Teacher Credentialing Accreditation

California law provides the Commission with the authority to accredit institutions to offer programs that lead to a credential to serve as an educator in California's public schools. Among other responsibilities, Education Code section 44372(c) sets forth the Commission's responsibility to rule on the eligibility of an applicant for initial accreditation for the purpose of offering a program of educator preparation. Section 44372 (c) reads as follows:

The powers and duties of the Commission regarding the accreditation system shall include the following:

- (c) Rule on the eligibility of an applicant for accreditation when the applying institution has not previously prepared educators for state certification in California, pursuant to subdivision (a) of Section 44227.

Education Code Section 44227 referred to in the above section reads as follows:

- (a) The commission may approve any institution of higher education to recommend to the commission the issuance of credentials to persons who have successfully completed a teacher education program if the program meets the standards approved by the commission.

The Commission requires that an institution seeking to offer new educator preparation program(s) must first be approved for initial accreditation as a new program sponsor and must do so by completing the Commission's IIA process.

Commission staff reviewed the structural changes approved by WASC as it relates to accreditation by the Commission to determine whether the institution needs to go through the Commission's initial institutional approval five stage process. In doing so, the Commission staff considered numerous aspects of the changes and their implications:

- 1) *The institution is not "new" to California.* For decades, Brandman University, first as part of Chapman University and then as a stand-alone WASC approved institution has a long and positive history of preparing educators in California.
- 2) *The institution remains an independent, nonprofit, WASC accredited institution of higher education.* Despite what the name may imply, the institution will not be based in Massachusetts. It will be affiliated with, not a new campus of, the University of Massachusetts system. UMass Global will not be a public institution as is its affiliate, the University of Massachusetts. Brandman has clarified that this is not an acquisition nor a merger, but an affiliation. The University of Massachusetts system and its campuses will continue to be accredited through the New England Commission for Higher Education. UMass Global will hold accreditation through the Western Association of Schools and Colleges Senior Colleges and University Commission.
- 3) *Change of Control Provides More Independence, Not Less with its New Affiliation:* Brandman University is currently affiliated with Chapman University and under the new structure it will be affiliated, but not a part of, the University of Massachusetts. The

change of control provides more independent control of the institution than the current organizational structure. As previously stated, under the change, UMass would have minority control on the Board of Regents, while the majority of seats will be independent of UMass.

- 4) *All administrative functions and organizational structure except at the highest level of the Board of Regents will remain unchanged.* Brandman has indicated that the changes proposed are solely in the governance at the Board of Trustees level but that the administrative functions, leadership, funding, resources, and other day-to-day operating functions will remain unchanged.
- 5) *There will be no change to the organizational structure and leadership within the School of Education.* The current Dean and administrative structure for the School of Education at Brandman will continue unchanged.
- 6) *There will be no change to the current credential programs as a result of the change.* No changes are being proposed for any credential programs offered.
- 7) *The institution's programs will continue to be focused on delivering educator preparation leading to California certification only.* The institution has no plans to offer the program in Massachusetts or outside of California at this time.
- 8) *Brandman is in good standing with the Commission.* Brandman's last accreditation visit, conducted in 2015, resulted in full accreditation with all standards, both Common and program standards met.
- 9) *Brandman's place in the accreditation cycle provides timely information to ensure alignment with standards.* Should Brandman University be approved by the Commission to continue operating under the new name and entity UMass Global, the institution will remain within its currently assigned accreditation cohort. This cohort is ideally situated to provide the Commission with timely information to ensure the renamed entity continues to meet all preconditions, Common Standards, and program standards. Within approximately the next year, the institution is subject to preconditions review, Program Review and Common Standards review. Additionally, the institution will submit data to the Annual Data System (ADS) by September 2021 as is required of all other Commission-approved program sponsors. A site visit is then scheduled for academic year 2022-23. Below are the current accreditation related dates specific to Brandman University.

Accreditation Dates Related to Brandman University

Below are relevant dates for Brandman University under the Commission's accreditation system. If Brandman is allowed to continue operating under its new name, UMass Global, these dates would remain effective for the institution.

Preconditions Submission – Due March 31, 2021

Brandman University (UMass Global, if Commission approves) is currently scheduled to submit Preconditions in March 2021. Staff will review all updated responses from the new entity UMass Global as it relates to all preconditions.

Annual Data Submission – Due September 15, 2021

Brandman University (UMass Global, if Commission approves) is scheduled to submit data on all of its educator preparation programs in accordance with the regular cycle for the Annual Data System (ADS) required of all institutions approved to offer educator preparation programs.

Program Review Submission – Due October 15, 2021

Brandman University (UMass Global, if Commission approves) is scheduled to submit documentation for Program Review in the fall 2021 for all Commission-approved programs (listed on page 1 of this item).

Common Standards Review – Due February 28, 2022

Brandman University (UMass Global, if Commission approves) is scheduled to submit documentation for Common Standards review in winter 2022. In so doing, Board of Institutional Reviewers will be able to ensure that the new entity UMass Global continues to meet the foundational aspects of supporting all of its educator preparation licensure programs required in the Commission's Common Standards.

Accreditation Site Visit – Fall 2022-Spring 2023

Brandman University (UMass Global, if Commission approves) is scheduled to host an accreditation site visit in academic year 2022-23. The most recent visit Brandman hosted was in April 2015 and was a joint visit with the Commission and the National Council for the Accreditation of Teacher Education accreditation team making it an NCATE legacy institution. NCATE Legacy institutions are institutions that received NCATE accreditation but have yet to host an accreditation site visit from the new national accrediting body, the Council for the Accreditation of Educator Preparation (CAEP).

CAEP Perspective

Because of the unique nature of the institutional change, staff inquired of CAEP as to the implications for the change on Brandman's CAEP accreditation. Staff at CAEP told Commission staff that they were viewing this change as essentially a name change without any substantive or operational implications for national accreditation of its educator preparation programs.

Documentation Provided

The Commission staff reviewed all aspects of the Initial Institutional Approval process that may be appropriate and applicable given the specific nature of this change in circumstances for an existing Commission-approved program sponsor. Because the changes impact only the governance structure at the Board of Regents level and the name of the institution, the Commission staff requested that Brandman University review the 12 Eligibility Criteria and provide the Commission with a written response, confirming that there will either be no change to their operations as it relates to each criterion, or where there is a change, so indicate. That document is provided in [Appendix A](#).

Also provided are the following:

- [Appendix B](#): A UMass Global Transition Document prepared by the institution that provides contextual information about the change.
- [Appendix C](#): An organizational chart of Brandman University's School of Education Curriculum Team (which will remain unchanged under the UMass name).

The Commission staff also noted that given the nature of the changes, it would be appropriate to review the updated Common Standards. As previously noted, Brandman University is already scheduled to submit preconditions by March 31, 2021 and Common Standards by February 28, 2022. All subsequent documentation necessary for the accreditation system will follow as scheduled, should the institution be allowed to continue to operate under the new name.

Notification to Candidates

Brandman University has indicated that all current candidates will be notified and, for a period of time, will have the option of obtaining either a Brandman diploma or a UMass Global diploma. If the Commission approves Brandman University to continue to offer educator preparation as UMass Global, Commission staff would request copies of the candidate notification documentation as evidence that all candidates have been provided information about the change as well as information about their options for their diploma.

Staff Recommendation

Given the above considerations, the Commission staff recommends approving Brandman University to continue as a Commission-approved program sponsor under the name UMass Global.

Next Steps

Staff will take appropriate next steps based on the Commission's action.

Appendix A
Responses to Commission Requested Initial Institutional Approval (IIA) Criteria

Criterion 1: Responsibility and Authority

Oversight at the School of Education and Institution level remain unchanged. Brandman University is presently part of the Chapman University System and as such the Chancellor presently reports to a Board of Regents (BOR) appointed by Chapman University.

With the change in affiliation, our revised bylaws that WSCUC approved, require that a majority of our BOR be independent. A minority are UMass affiliated (UMass Board of Trustee members and employees such as the system President). The Chair of the BOR must also be independent.

Our current Chancellor will report to the BOR and all organizational structures and faculty governance at Brandman University remain unchanged. Becoming an affiliate of the UMass system does not mean we are joining the UMass System, and this legal distinction is a very important substantive (operational) distinction. What is changing is the university name from Brandman University to UMass Global and the members of the BOR. Although affiliated with University of Massachusetts, UMass Global is not governed by the University of Massachusetts Board of Trustees. The organizational chart is presented here:

UMass Global (formally Brandman University)

A California nonprofit affiliate of the University of Massachusetts

UMass Global Board of Regents (See attached for pending Board Membership, minority of members affiliated with UMass and majority of members including the Chair are independent)

|

Chancellor Gary Brahm

|

Provost/EVC Charles Bullock

|

Patricia White, Ed.D.
Dean of Education

Dean Patricia Clark White will continue overseeing all educator preparation programs along with all administrators, faculty, and staff working with Brandman University credential programs. Dean White, along with all direct and indirect reports within the School of Education will be employed by UMass Global, a California based non-profit institution formerly known as Brandman University. All identified individuals responsible for credential recommendations and program oversight will also remain unchanged.

Criterion 2: Lawful Practices

As UMass Global, all Brandman University policies governing all personnel decisions remain unchanged. Additionally, all policies related to SOE candidate admission, retention, and graduation will remain in effect and unchanged.

Criterion 3: Commission Assurances and Compliance

UMass Global will continue to abide by all assurances required in Criterion 3 of the IIA Stage II Eligibility requirements.

Criterion 4: Requests for Data

There will be no change in personnel currently responsible for reporting and responding to all requests from the Commission.

Criterion 5: Grievance Process

There will be no change to the Brandman University Grievance processes. UMass Global will be an affiliate of University of Massachusetts and, as such, their policies or procedures will not be adopted. UMass Global will continue following all Brandman University grievances policies and procedures.

<https://my.brandman.edu/sites/Student/UniversityPolicies/osc/Pages/Home.aspx>

requires faculty or student login.

When students have a question, concern, or complaint regarding their Brandman experience, they should always initially contact their campus director for guidance and possible resolution. However, there may be circumstances when students are still uncertain as to University policies and procedures, appropriate channels of communication, or alternative options available for resolving disputes.

In those instances, students are encouraged to contact the Brandman Office of Student Concerns "OSC" for guidance. OSC provides informal, confidential assistance in resolving conflicts, disputes, or providing relevant information. OSC does not impose solutions but does identify options and strategies for resolution, or providing contact with appropriate college resources. OSC is an advocate for the fair resolution of a problem, not for any particular party, and gives equal attention to the rights of all concerned.

OSC reports to the Division of Student Services for administrative and budgetary purposes.

Students should contact OSC if they

- Need information about policies and procedures and are unable to locate the information*
- Have an issue or conflict related to the university and don't know where to go for resolution*
- Are dissatisfied with results of a conflict within the University and want to know what their options are*

Standards of Practice

OSC is a Resource:

- *Listens, counsels, and explores options;*
- *Clarifies issues; gathers information about the source and conditions of an issue;*
- *Explains University academic & administrative policies and procedures;*
- *Facilitates communication and collaboration of all parties involved in finding or mediating a solution;*
- *Provides information about resources available and makes referrals when necessary;*
- *Provides feedback to University constituencies regarding identified issues or trends in problems and concerns which have arisen;*

OSC does not provide psychological counseling;

OSC does not provide legal advice.

OSC will not serve as a bypass for standard university processes.

Submitting a concern assures that no adverse action will be taken against the student.

The Division of Enrollment and Student Services will be contacted in cases where a concern cannot be resolved.

Steps to Complete a Contact Ticket

To contact OSC, please click on the button below to complete the contact ticket. An OSC representative will respond to your Brandman email address. The standard response time to submitted tickets is 24-72 business hours (some resolutions may take longer depending upon the issues identified).

Credential candidates will continue to be informed of grievance procedures through orientations, catalog, and university website. Personnel currently advising candidates on these grievance policies and procedures will also remain unchanged.

Criterion 6: Communication and Information

This criterion is not applicable as Brandman already offers programs and has a well-established and effective website: www.brandman.edu

The university website has information about the institution, all approved educator preparation programs, and is easily accessible to the public. Information about university mission, governance and administration, admission procedures, and information about all Commission-approved educator preparation programs are public facing.

Criterion 7: Student Records Management, Access, and Security

As UMass Global there will be no change to any of the criterion 7 elements.

The institution will continue to demonstrate that it maintains and retains student records.

Institutions seeking Initial Institutional Approval will provide verification that:

- (a) Candidates will have access to and be provided with transcripts and/or other documents for the purpose of verifying academic units and program completion.
- (b) All candidate records will be maintained at the main institutional site or central location (paper or digital copies).
- (c) Records will be kept securely in locked cabinets or on a secure server located in a room not accessible by the public.

We will continue to appropriately secure all student records using our current systems.

Criterion 8: Disclosure

There will be no change to the credential programs or delivery method for credential programs currently offered as Brandman University. As UMass Global we will continue to only offer these credential programs in California and not out of state. UMass Global is a private, non-profit California-based IHE.

Criterion 9: Veracity in all Claims and Documentation Submitted

As UMass Global we continue to affirm that all information provided to the Commission will continue to be truthful and accurate and understands that evidence of a lack of veracity is cause for denial of Initial Institutional Approval.

Criterion 10: Mission and Vision

UMass Global's mission and vision for educator preparation will remain consistent with California's approach to educator preparation. As an independent affiliate of University Massachusetts, UMass Global is not required to align its mission and vision to the University of Massachusetts.

Vision: School of Education will be the acknowledged and prominent authority in creating educators whose leadership and exemplary teaching transform public policy and catalyze local, state, national and global communities to achieve their highest potential.

Mission: The mission of the School of Education is to develop innovative and caring leaders, scholars, and practitioners who collaborate to solve complex problems, transform organizations, and educate diverse student populations through discovery, inspiration, and innovation.

Criterion 11: History of Prior Experience and Effectiveness in Educator Preparation

UMass Global will be an affiliate of University of Massachusetts and is not governed by them. Therefore, although University Massachusetts history pertaining to education programs is well recognized, it does not have bearing here. UMass Global is a continuation of Bradman University which has had a long, positive history in CA receiving full accreditation with no stipulations on the most recent Commission site visit.

Criterion 12: Capacity and Resources

UMass Global will remain self-sufficient, adequately sourced, and there will be no changes to the current revenue/expenditure structure faculty, or facilities.

There will be no changes with how instructional services are delivered to candidates. When Brandman University changes its name to UMass Global it will remain a California based non-profit, private university. Faculty and instructional personnel continue be located and provide services in California.

There will be no relocation or change in credential education services. Credential related educational services will remain in California and headquartered in Irvine.

Appendix B
Commission UMass Global Transition Document
(Provided by Brandman/UMass Global)

UMass Global as an entity is pending US DOE approval anticipated prior to the Commission’s February 2021 meeting. Once this approval has been secured, Brandman University becomes UMass Global.

Background

Brandman University was established by Chapman University – a private institution in Orange, California founded in 1861 which consistently ranks among the country’s top universities. Formerly named Chapman University College, Brandman’s original purpose was delivering high quality education to the El Toro Marine Corps Air Station.

Now a separate university, Brandman remains military-friendly but has expanded its programs to include the adult learner and serves a large and diverse student population. To best serve our students, we have offered education both on our campuses and online for over two decades. We are as proud of our rich academic past as we are of our technology-driven future.

Brandman University is a recognized leader in providing adult learners the support they need to complete college, credentials, and graduate degrees, and the university of Massachusetts (UMass) has a very strong national reputation for quality and innovation in higher education. By affiliating with UMass, Brandman is expanding its reach at a critical moment. Brandman University has had a long, positive history in CA receiving full accreditation with no stipulations on the most recent Commission site visit. As of January 4, 2021, over 2,600 candidates are actively enrolled in Brandman credential programs:

CREDENTIAL	ACTIVE ENROLLMENT
Multiple Subject	701
Single Subject	549
Education Specialist Mild/Moderate Disabilities	307
Education Specialist Moderate/Severe Disabilities	131
Education Specialist Mild/Moderate and Moderate/Severe Disabilities	46
Education Specialist Early Childhood Special Education	64
Education Specialist Autism Spectrum Disorder Added Authorization	76
Education Specialist Early Childhood Added Authorization	8
California Teachers of English Learners (CTEL)	154
Preliminary Administrative Services	67
Clear Administrative Services	93
PPS School Counseling	267
PPS School Psychology	223
Grand Total	2686

Why affiliate with the University of Massachusetts?

As part of its strategic plan for 2018/19-2020/21, and before it connected with University of Massachusetts about a potential relationship, Brandman University made the decision to pursue strategic partnership opportunities with a larger university in order to achieve economies of scale and expand its ability to deliver on its mission. University of Massachusetts is the partner that best met Brandman's objectives, giving both institutions the opportunity to leverage the other's relationships, skills, and expertise. Through this partnership, Brandman (as UMass Global) will retain its operational decisions and its academic freedom. Brandman believes that its affiliation with University of Massachusetts is in the best interest of the institution, and that it will provide Brandman with the ability to expand upon its reputation for offering innovative academic programs and for delivering positive outcomes that benefit non-traditional student populations.

Will Brandman become a new institution?

No. Brandman will remain the institution the community knows. It will have the same chancellors, deans, academic and student support leaders, faculty, and staff. For the past ten years, Brandman has affiliated with Chapman University. At this time, Brandman is planning to change its affiliation to University of Massachusetts and change its name to UMass Global. The Board composition will change from a majority of Chapman representatives to a minority of UMass representatives and a majority of independent members. As UMass Global, it will retain its standing as a private nonprofit university headquartered in California. Under the new name, UMass Global, Brandman's campuses, on-base sites, and offices throughout California, Oregon, and Washington will remain the same. Brandman's relationships with military bases, community colleges, school districts, nonprofits, and U.S. businesses will be constant. And Brandman's exemplary student support and academic programs will continue to serve current and newly enrolled students.

Will Brandman change its headquarters?

No. Under the new name, UMass Global, the university will remain a WASC Senior College and University Commission (WSCUC) accredited nonprofit institution headquartered in Irvine, California. The new name and affiliation has already been approved by WSCUC. The partnership will not result in Brandman becoming a public University of Massachusetts campus and the headquarters and main campus will remain in Irvine, CA.

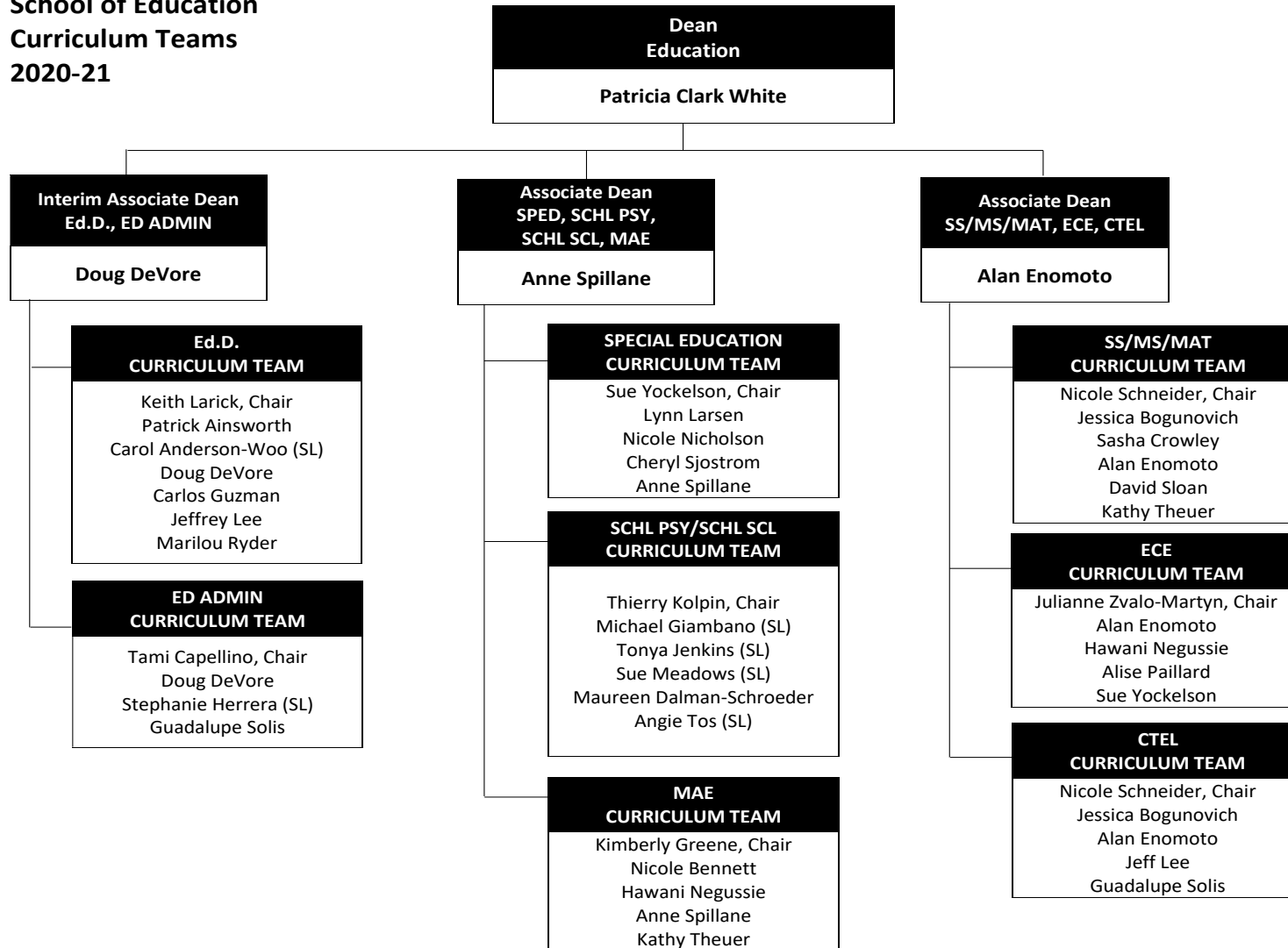
Is this an acquisition or merger?

This is not an acquisition or merger. Chapman University will transfer to the University of Massachusetts rights to appoint members to the Brandman Board of Regents. Once this is accomplished, Brandman University will no longer be affiliated with Chapman University. Brandman University/UMass Global will remain a California based, private, independent nonprofit entity.

In order to better understand the nuances of this transition Commission staff have identified elements of the Initial Institutional Approval (IIA) Criteria for response.

Appendix C

Brandman University School of Education Curriculum Teams 2020-21



Appendix D

WASC Letter

November 12, 2020

November 12, 2020

Dr. Gary Brahm
Chancellor
Brandman University
16355 Laguna Canyon Road
Irvine, CA 92618

Dear Chancellor Brahm:

During its November 4-6, 2020 meeting, the WASC Senior College and University Commission (WSCUC) considered a proposal submitted by Brandman University (Brandman) for a Change of Control to the University of Massachusetts (UMass) from Chapman University (Chapman). This change is a Structural Change, defined by WSCUC Substantive Change policy as a change in mission, ownership, legal status, or control.

Consideration of this Structural Change follows submission by the institution of a proposal and its subsequent review by a panel of the Substantive Change Committee via video conference on August 20, 2020, submission of additional information requested by the panel, and a remote visit conducted by video meetings with representatives from Brandman, UMass, and Chapman on dates between September 23-30, 2020.

During its November 2020 meeting, the Structural Change Committee of the Commission reviewed the original Structural Change application materials, additional materials that were requested to supplement the original proposal, the visiting team report, and an institutional response to the team report. At that November meeting, the Committee requested clarification on items relating to the proposed bylaws, the proposed new board, issues regarding a proposed change of name for Brandman, and clarification of the availability of library services post-transition.

Following receipt of the clarifying items, the Structural Change Committee referred to the Commission its recommendation that the Change of Control be approved.

After deliberation, the Commission acted to:

1. Receive the Structural Change Committee recommendation.
2. Approve the Change of Control from Chapman to UMass.
3. Require a post-implementation site visit within six months of implementation of the proposed change. As part of the post-implementation visit report, Brandman should provide the marketing plan and materials that will be used to attract students, and identify the placement and purpose

of distinguishing statements, alerts, comparisons, and disclosures to clarify the proposed new name of the institution and to demonstrate how Brandman (if still in use), UMass Global Campus, UMass, and any other relevant affiliated institutions are effectively differentiated with respect to programs, degrees and accreditation.. This should include the precise messaging that will be used to attract students, in all forms that such messaging shall take, e.g., website, email, brochures, flyers, and Brandman's plan for monitoring the accuracy of students' understanding of the differences between UMass and Brandman/UMass Global Campus, including any monitoring results available as of that date.

It is the responsibility of Brandman to notify the Commission immediately of the completion of the transaction and the completion of all other necessary approvals for implementation of this change. Upon closing of the transaction, Brandman must report immediately any material modification or changes in the proposed terms to WSCUC to determine if further review or action is necessary. It is also Brandman's responsibility to remain in compliance with state and federal law as the change is implemented

This letter will be posted on the WSCUC website in accordance with WSCUC Commission policy. If Brandman would like to respond to the Commission's findings, a link to your response will be posted on the WSCUC website.

Finally, the Commission wishes to express its appreciation for Brandman's cooperation during this Structural Change 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 or comments about this letter or the action of the Commission.

Sincerely,



Jamienne S. Studley
President

CC: Tracy Tambascia, WSCUC Vice-Chair
Laurie Dodge, Accreditation Liaison Officer
William Booth, Chair, Brandman Board of Regents
Members of the WSCUC Substantive Change Panel
John Hausaman, WSCUC Assistant Vice President
Maureen Maloney, WSCUC Vice President