

July 14, 2023

Dr. Robert Humphreys President Humphreys University 6650 Inglewood Avenue Stockton, CA, 95207

Dear President Humphreys:

This letter serves as formal notification and official record of action taken concerning Humphreys University (Humphreys) by the WASC Senior College and University Commission (WSCUC) at its meeting on June 30, 2023. At that meeting the Commission acted to continue the sanction of Warning. This action was taken after consideration of the report of the review team that conducted the Special Visit to Humphreys on February 8-10, 2023. The Commission also reviewed the institutional report and exhibits submitted by Humphreys prior to the visit, the supplemental materials requested by the team, and the institution's April 11, 2023 response to the team report. The Commission appreciated the opportunity to discuss the visit with you and your colleagues Jess Bonds, Provost/ALO, Matthew Reynolds, Dean of Law, Cynthia Bacerra, Dean of Undergraduate Instruction, Lisa Kooren, Dean of Institutional Research, Donna Roberts, Associate Dean, Pam Closs, Chair of Court Reporting, and Wendy Campigli, Law Registrar. Your comments were very helpful in informing the Commission's deliberations. The date of this action constitutes the effective date of the institution's status with WSCUC.

The Commission acted to continue the sanction of Warning because it found that Humphreys has not demonstrated that it is in compliance with WSCUC Standards 1, 2, and 3. Humphreys has been on sanction since March of 2022. The maximum time for compliance is spring of 2024. At that time, the Commission will determine whether the institution has taken appropriate corrective action and has come into compliance with the Standards. If the Commission determines that deficiencies remain, the Commission may take an "adverse action," in this case the withdrawal of accreditation, or if warranted grant a good cause extension of accreditation for no more than two additional years. An institution under sanction must address the areas cited by the Commission expeditiously, with the full attention of the institution's leadership.

The accreditation status of the institution continues during Warning. However, while on Warning, any new sites or degree programs initiated by the institution must be approved through the substantive change process.

Actions

- 1. Receive the Special Visit team report
- 2. Continue a Warning
- 3. Schedule a Special Visit to be conducted in spring 2024, addressing Standard 1, particularly CFRs 1.7 and 1.8, Standard 2, particularly CFR 2.1, and Standard 3, particularly CFR 3.4.

4. Schedule a Progress Report to be submitted no later than October 1, 2023, to provide an analysis of the status of WSCUC compliance for all academic programs offered at Humphreys.

Issues to be Addressed

- 1. Fiscal Viability
 - Humphreys continues to experience operational deficits and projects several more years of deficits due to low enrollment and inadequate revenue diversification strategies. The university must expedite plans to increase revenue. In addition, it must attend to strategies to project enrollment growth, set realistic enrollment goals that are attainable and data informed, assess the viability of proposed new programs, align budgetary processes with the strategic priorities, and address ongoing deficits. (CFR 3.4)
- 2. Academic Integrity and Communication with WSCUC
 - In two instances the institution did not properly follow the WSCUC substantive change process in introducing new programs. Humphreys must re-examine all programs and programmatic relationships to ensure that they are in compliance with WSCUC Standards and consistent with institutional plans and needs. It is important for Humphreys to ensure WSCUC requirements related to the approval of academic programs and off-site locations are being followed, consistent with the university's responsibilities. (CFRs 1.7, 1.8. and 2.1)
- 3. Governance
 - The university needs to provide resources to implement and maintain the newly created leadership and decision-making structures. Organizational and decision-making processes should be clear, formalized, data-informed, and widely distributed. The faculty governance structure should continue to be developed to support faculty in exercising effective academic leadership. The Board of Trustees, in accordance with its bylaws, should reactivate committees that support its fiduciary and oversight responsibilities. The Board should expeditiously plan for its education and development and utilize the results of the recent board assessment to improve. (CFR 3.7, 3.9, and 3.10)
- 4. Strategic Planning
 - The university's strategic planning efforts have been heavily affected by the leadership decisions to discontinue its MOU with Maxwell College and cancel the expansion of the ABLE Charter School concurrent enrollment strategy. For these reasons, Humphreys should accelerate the completion of its strategic plan update with the addition of revenue diversification strategies separate from facility rental and enrollment growth and the development of achievable strategies to address ongoing deficits including: 1) the creation of enrollment goals that are attainable and data informed; 2) the establishment of viability assessments of proposed new programs; and 3) the implementation of budgetary processes that align with the strategic plan.. (CFR 3.4)

Further Recommendation

1. The institution should further develop a data-informed culture for regularly generating, evaluating, and disseminating standardized and disaggregated data, including data on student success, to support strategic, fiscal and enrollment planning and inform decisions on program viability. (CFRs 1.2, 3.4, 4.1)

The institution may request a review of this decision to continue the Warning within 28 days of receiving the Commission Action Letter, according to the procedures outlined on pages 40-42 of the WSCUC 2013 Handbook. Humphreys is required to notify all current and prospective students of this action within seven days of receipt of this letter. For prospective students, the notice must be available on Humphreys' home page of its website. Humphreys must provide a copy of that notice to the Commission within the same seven-day period.

The Commission also requires a meeting between the WSCUC staff and representatives of Humphreys, including the CEO, representatives of the governing board, and senior faculty leadership within 90 days from the date of the Commission action. The purposes of the meeting are to further clarify the reasons for the Commission's finding of noncompliance and to discuss the institution's plans for responding to this action.

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

Please contact me if you have any questions about this letter or the action of the Commission.

Sincerely,

Amen Judler

Jamienne S. Studley President

JSS/thh

Cc: Phillip Doolittle, Immediate Past Chair Tracy Poon Tambascia, Chair Jess Bonds, ALO Ronald Guntert, Board Chair Members of the Accreditation Visit team Tamela Hawley, Vice President