

November 17, 2023

Dr. David Poole
President
San Diego Christian College
280 Riverview Parkway
Santee, CA 92071

Dear Dr. Poole:

This letter serves as formal notification and official record of actions taken concerning San Diego Christian College (SDCC) by the WASC Senior College and University Commission (WSCUC or the Commission) at meetings on November 3 and 15, 2023. These actions were taken after reviewing SDCC's request for consideration of new evidence of compliance with WSCUC Standards pursuant to the institution's appeal of the withdrawal of its accreditation effective July 14, 2023.

Procedural History

In a letter dated July 14, 2023, the Commission informed SDCC that its accreditation had been withdrawn. The Commission's action followed a series of special visits and Commission actions beginning in 2016 that related to concerns over the College's financial stability and sustainability. SDCC's most recent accreditation visit was conducted in 2016. At that time, the Commission reaffirmed the College's accreditation for eight years and requested a Special Visit to occur in 2019. After the Special Visit in 2019, the Commission found SDCC to be out of compliance with CFRs 3.4 and 3.6, and imposed Probation with another Special Visit to be scheduled in fall 2020. As a result of the fall 2020 Special Visit, the Commission removed Probation but found continued lack of compliance with Standard 3 and imposed a Warning. By letter dated November 17, 2020, the Commission extended accreditation for good cause for 18 months until spring 2022 and scheduled another Special Visit to address financial sustainability. As a result of the spring 2022 Special Visit and continuing concerns over SDCC's financial position, the Commission found SDCC out of compliance with Standards 2 and 3 and issued an Order to Show Cause. Another Special Visit was scheduled for spring 2023.

During the spring 2023 visit, the visiting team noted some progress in leadership, enrollment, and improved prospects for the institution's financial stability. After reviewing the Special Visit Report and additional information provided by SDCC in its response to that report, and after a meeting with representatives of the institution at the June 2023 meeting, the Commission determined that the institution remained out of compliance with Standards 2 and 3, and specifically CFRs 2.10, 2.13, 3.4 and 3.8. The Commission also determined that since SDCC had been continuously on sanction since 2019, the College had exhausted the maximum amount of time (four years) then permitted to come into compliance with the Standards. No further extension of accreditation for good cause was available under WSCUC policies and, accordingly, the Commission withdrew SDCC's accreditation subject to appeal.

By letter of July 25, 2023, SDCC submitted its *Notice of Intent to Appeal the Commission's Action*. On September 22, 2023, SDCC submitted its request for the Commission to consider new evidence and the

basis for that request. I initiated the New Evidence Proceeding which paused the appeal. The New Evidence Panel reviewed the materials and found that all evidence submitted by SDCC in its *New Evidence Document* was new and met the tests for significance and materiality. The Panel directed the new evidence to be submitted to the Commission. In November 2023 the Commission accepted SDCC's evidence of compliance with CFRs 2.10, 2.13, and 3.8, and found that SDCC remains out of compliance with CFR 3.4. The Commission also acted to revise its policies to extend from two to four years the maximum time allowed for institutions to be on good cause extension. The Commission subsequently determined that there is sufficient basis to grant SDCC a good cause extension of accreditation. SDCC will remain on Show Cause.

Actions

1. Receive the New Evidence Report
2. Continue the sanction of Show Cause
3. Grant a Good Cause Extension of Accreditation to July 30, 2024
4. Schedule a Special Visit in spring 2024 to address Standard 3, CFR 3.4

These actions constitute final disposition of the new evidence proceeding and accordingly the appeal of the July 2023 withdrawal of accreditation is now concluded. I will advise the chair of the Appeal Panel of these actions with a recommendation that the appeal be dismissed.

Subsequent monitoring and reaffirmation steps will be determined at the time the Commission considers action on the Special Visit report.

The Commission acted to continue the sanction of Show Cause because it found that SDCC is not in compliance with WSCUC Standard 3. The accreditation status of the institution (accredited on Show Cause) continues during Show Cause. However, while on Show Cause, any new sites or degree programs initiated by the institution must be approved through the substantive change process.

When the Commission finds that an institution fails to meet one or more of the Standards of Accreditation, it is required to notify the institution of the deficiencies and establish a time period within which the deficiencies must be corrected. Under the Commission's policies the timeframe may not exceed two years absent a good cause extension. In this case such an extension has been granted to July 30, 2024. If the institution has not remedied the deficiencies at the conclusion of this extension period, the Commission will withdraw the institution's accreditation unless it acts to further extend the timeframe for good cause shown up to the total allowable time for extension.

An institution under the sanction of Show Cause must address the areas cited by the Commission expeditiously, with seriousness and the full attention of the institution's leadership. It is the responsibility of the Commission to determine, at the end of the sanction period, whether the institution has made the necessary corrections and has come into compliance with Commission Standards. (Please refer to the 2013 Handbook of Accreditation.) It is also the responsibility of the institution to demonstrate to the Commission that it has understood the issues raised in this letter, responded to them satisfactorily, and made the necessary changes to come into compliance with Standard 3.

Areas of Noncompliance

The Commission determined that SDCC has not demonstrated compliance with Standard 3, specifically with CFR 3.4:

The institution is financially stable and has unqualified independent financial audits and resources sufficient to ensure long-term viability. Resource planning and development include realistic budgeting, enrollment management, and diversification of revenue sources. Resource planning is integrated with all other institutional planning. Resources are aligned with educational purposes and objectives.

The Commission requires the institution to respond to the following issue relative to its compliance with Standard 3, CFR 3.4:

The institution continues several years of spending in excess of revenue, although the scale of deficits has declined in the most recent years. It is not clear that recently revised financial projections, which remain heavily dependent on enrollment growth and fundraising, are realistic given past patterns. The institution continues to experience declines in enrollment, most recently from 500 to 100 students. The institution must provide evidence that it has stabilized its financial position, strengthened its financial planning and management, and can ensure long-term viability. The Commission granted a good cause extension on the basis of new evidence that demonstrated sufficient progress in rectifying deficiencies capacity, understanding and planning.¹ The Commission expects to monitor the institution closely through the extended sanction period, periodically assessing the improvement in the institution's financial position and progress toward compliance with the Standard.

The Commission requires a meeting between the WSCUC staff and representatives of SDCC, including the Chief Executive Officer, representatives of the governing board, and senior faculty leadership within 90 days from the date of this letter. The purposes of the meeting are to further clarify the reasons for the Commission's finding and basis for decision, to review the actions taken as of the date of the meeting, and to discuss the institution's plans for responding to this Commission action. WSCUC will contact SDCC's ALO to make arrangements for this meeting.

Commission policy requires that in the case of a sanction, a public statement will be prepared in consultation with the institution acknowledging the institution's status. The institution will need to disclose this new decision to current and prospective students within seven days; the institution should work with WSCUC VP Tamela H. Hawley on appropriate updates to its statement. The Commission reserves the right to make the final determination of the nature and content of the public statement. The public statement must be posted on the institution's website. In addition, any reference to WSCUC accreditation on the website and in public statements must be accompanied by the words "Currently on Show Cause."

In accordance with Commission policy, a copy of this letter is being sent to the chair of SDCC's governing board. The Commission expects that this action letter will be posted in a readily accessible location on the SDCC 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 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](https://www.wscuc.org) website.

¹ See 2013 WSCUC Handbook of Accreditation, Part IV Forms of Possible Commission Action, p. 3 of 6; <https://www.wscuc.org/handbook2013/#commission-review-process-for-institutions-on-sanction>

Submitted Teach-Out Plan Remains in Effect

An institution placed on Show Cause by the Commission must submit to WSCUC a plan that would be implemented if the institution were to close. A teach-out plan identifies opportunities for the students of a closing institution to complete their program at other institutions offering the same or similar degree programs, certificates or curricula leading to professional licensure, regardless of students' academic progress at the time of closure. The WSCUC Teach-Out Plans and Agreements Policy and associated Guide provide information on what to include in a teach-out plan. SDCC has submitted a teach-out plan and it remains in effect, with modification as necessary to reflect the additional extension period.²

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

Sincerely,



Jamienne S. Studley
President

Cc: Tracy Poon Tambascia, Commission Chair
Katina Evans, ALO
Jeremy McGarity, Board Chair
Tamela H. Hawley, Vice President

² Note 34 CFR § 668.43(a) (19) states: Institutional information that the institution must make readily available to enrolled and prospective students under this subpart includes, but is not limited to— “If the institution is required to maintain a teach-out plan by its accrediting agency, notice that the institution is required to maintain such teach-out plan and the reason that the accrediting agency required such plan under § 602.24(c)(1). . .”