



February 26, 2008

Luis Molina
Acting President
New College of California
777 Valencia Street
San Francisco, CA 94110

Dear President Molina:

At its meeting on February 20-22, 2008, the Commission considered the report of the Special Visit team that conducted a three-day review of New College of California on November 12-14, 2008. New College had been placed on probation at the June 2007 Commission meeting, at which time this Special Visit was scheduled. The Commission also had access to the Institutional Report for this visit, the report of the special investigation team that conducted a review in May 2007, and New College's response to that report, dated June 18, 2007. The Commission also considered New College's response to the Special Visit report, dated January 30, 2008, and a letter and plan from the Board of Trustees, dated February 15, 2008. In addition, the Commission's designated readers obtained information during a pre-meeting conference call, held on February 12, 2008, with three institutional representatives, and the Commission considered information that you; Trustees Jane Swan, Phillip Knowlton, Rodell Rodis, Tedd Corman; Interim Chief Financial Officer Francisco Leite; Law School Chair Ed Roybal; Graduate Psychology Chair Fred Rosendal; Humanities Chair Jon Garfield; and Faculty Representative Darbol Mesbah presented during your appearance before the Commission on February 21, 2008.

Background

The November 2007 Special Visit was conducted as a result of two separate, but related, matters. First, following the review of an Interim Report submitted by New College to the Interim Report Committee in fall 2006, the Interim Report Committee called for a Special Visit in fall 2007 to address New College's deteriorating financial situation. Second, as the result of a special investigation conducted in spring 2007 under the Commission Policy on Summary Sanctions for Unethical Institutional Behavior, the Commission expanded the scope of the fall 2007 Special Visit to encompass an array of

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serious compliance issues identified during the course of the investigation. The Commission's action letter of July 6, 2007, set forth seven areas of serious concern, indicating that "if there is not significant improvement by the time the team visits in fall 2007 in all of the areas noted, the Commission will consider whether to terminate the accreditation of New College." The Commission's concerns were set forth as follows:

1. Operational Integrity: Apparent failure of New College to have and implement basic policies and procedures relating to admissions, enrollment, student files and other related records, award of credit, award of grades, financial aid, scholarships, and international student reporting and records. (CFRs 1.3, 1.7, 1.8, 2.4, 3.8, 4.4)
2. Academic Integrity and Quality: Establishment of a degree program that did not meet WASC Standards and was not reviewed and approved appropriately within the College; excessive use of independent and self-paced study without internal standards, requirements, or controls; lack of uniform and acceptable standards for the award of degrees, grades and credit. (CFRs 1.1, 1.7, 1.8, 2.1, 2.2, 2.4, 2.6, 2.12)
3. Systems of Accountability, Program Planning, and Program Approval: Lack of required processes for faculty and administration to study, plan, and approve new programs and to conduct program review; unclear lines of reporting and responsibility such that accountability is absent. (CFRs 1.3, 2.4, 2.7, 3.10, 3.11, 4.4)
4. Decision Making, Governance and Leadership: Lack of any meaningful established role for faculty; unbridled presidential authority; failure of the board to exercise oversight regarding critical decisions within its purview. (CFRs 1.3, 3.8, 3.9, 3.10)
5. Financial Sustainability: The worsening financial condition of the college as reflected in the longstanding and declining negative financial ratios; large accumulated deficits. (CFRs 3.5, 4.1, 4.2, 4.3)
6. Substantive Change: The disregard of WASC requirements for approval of new programs that constitute substantive changes. (CFR 1.9)
7. Commitment to Accreditation and Relationship to WASC: The failure of the administration and board to understand the gravity of the issues raised by the special investigation and to respond fully and honestly, and with meaningful, effective steps.

The Commission's July 6 action letter mandated that no new programs, concentrations or majors be started; that enrollment in the PLUTE and Experimental Performance programs be suspended; that a review of programs to ascertain which programs required Substantive Change approval be conducted; that presidential scholarships be suspended; and that the action letter be widely distributed. New College complied with these requests.

The letter also requested that a curriculum and substantive change audit be provided, along with a description of the core courses for the Humanities degree program, in 30 days. The report was

provided in a timely manner, but lacked a substantial amount of the information and documentation requested.

New College submitted its Special Visit report as requested in September 2007. This report addressed some, but not all, of the important matters that were raised in the July 6 action letter. Some of the required documentation, such as up-to-date student transcripts and an employee audit, could not be provided then or at the time of the November Special Visit.

Between July 6 and the Commission meeting in February 2008, WASC staff worked closely with New College to provide guidance and support. During this time, the WASC staff met three times in person with New College representatives and conferred frequently by phone and email.

Findings of the Commission

During its relationship with New College, the Commission has given special recognition to the special mission of the College and its outreach efforts to underserved communities. It is largely as a consequence of its special mission that the Commission has been so forbearing in its actions with relation to the College. Many of the issues raised during the last year have arisen and been cited as concerns over the course of the institution's accrediting history with WASC. Indeed, in reviewing that history, the Commission noted that New College has been on a sanction for 17 of the last 27 years.

The issues now before the Commission are fundamental to the basic accreditability of the College. As the Commission noted in its July 2007 action letter, New College unequivocally bears the burden of demonstrating that it is financially sustainable and that its records and systems are "accurate, fully protected, and secure. Without reliable evidence that these elements are in place, the fundamental basis for the public certification that WASC accreditation represents does not exist."

The Special Visit Team found that, notwithstanding the latest efforts to respond to these issues, New College "has serious and longstanding deficiencies in each of the seven areas of the review." Based on New College's entire record, this Special Visit report, and events that have taken place since that time, the Commission has concluded that New College fails to meet the WASC Core Commitments to Capacity and Educational Effectiveness and the Standards of Accreditation. The Core Commitment to Capacity requires that "[t]he institution functions with clear purposes, high levels of institutional integrity, fiscal stability, and organizational structures to fulfill its purposes." The Core Commitment to Educational Effectiveness states that institutions employ "processes of review, including the collection and use of data, that assure delivery of programs and learner accomplishments at a level of performance appropriate for the degree... awarded."

The bases for the Commission's conclusion are set forth below.

Financial Sustainability and Management: New College does not meet WASC’s standards for financial sustainability, management and planning. New College has been in a state of financial distress for much of its history with WASC. In 2002, in finding that New College did not meet the expectations of Standard 3, the Commission noted that, “The College does not have stable revenues, sufficient financial reserves, effective financial controls and systems, or effective financial budgeting and planning.”

New College’s finances have continued to deteriorate, and substantial portions of the institution are no longer in operation. The institution is, at present, insolvent. It had an operating deficit at the end of the 2006-2007 fiscal year and an almost 50 percent increase in liabilities in that year. New College’s financial ratios have continued to decline deeper into the negative range during the last two years, reflecting the lack of available assets to cover debt. The College has borrowed heavily from individuals, banks, and other entities to cover basic operating expenses. In August, the Department of Education mandated that New College post an additional letter of credit by year-end to continue participation in the Title IV financial aid program. This letter has not yet been posted. The Department placed New College on Heightened Cash Monitoring and audited its financial aid records in September. New College’s continued participation in Title IV financial aid programs, on which it is dependent, is in serious question.

New College has been unable to meet its payroll obligations since the end of November and postponed the start of the spring semester for all its programs except the law school, teacher education and graduate psychology internships, and the Science Institute, in the hopes of remedying the cash-flow crisis by selling property and by seeking the resumption of the flow of financial aid funds. New College property is being sold, but most of it is heavily mortgaged so that sales result in debt relief but yield little net revenue. Measures to reduce operating expenses have been put in place. Just a few days before the Commission meeting, the College presented a tentative plan for a much smaller institution that would include only the Law School, School of Graduate Psychology, and the Weekend BA Degree Completion Program.

The Commission appreciates the strong desire of the board to continue New College in operation; however, the source of funding and the viability of the college, even as a smaller institution, are far too speculative to meet WASC standards for financial sustainability. New College does not have resources “sufficiently developed to support and maintain the level and kind of educational programs offered both now and for the foreseeable future.” (CFR 3.5)

New College has also failed to meet basic standards of financial management and controls. As noted in the Special Visit team report, the preliminary audit for 2006-2007 resulted in “22 findings, some of which were significant enough to be classified as material weaknesses in internal controls.” The Commission recognizes the efforts of New College’s transition team to establish adequate internal controls, cut costs, sell unnecessary property, and remedy a long history of poor financial decisions and management. However, these changes have come too late to overcome the current severe financial crisis.

New College’s persistent failure to research, study and deliberate before making key decisions that have a financial impact, and to plan realistically and wisely, have been major causes of its

ongoing financial problems and the current financial crisis. As recently as November 2007, New College's board adopted an ambitious plan that projected a dramatic growth in enrollment in the next five years, and reviewed a draft development plan that called for raising \$10 million, a sum that the Special Visit team found "overly optimistic" in view of the lack of a record of success in fundraising and the lack of resources in place to engage in such a campaign. It should be noted that, as of the date of the Commission meeting, the promises of major commitments to support the college have not been forthcoming. (CFR 3.5, 4.1)

In sum, New College fails to meet the Core Commitment to Capacity in that it lacks the financial resources, management and planning to meet WASC Standards and to fulfill its mission under Standards 1, 3 and 4, and particularly CFRs 1.3, 1.8, 3.5, and 4.1-4.3.

Operational Integrity. As noted in the July 6 action letter, the Commission has found that "New College lacks operational integrity, one of the basic elements of the Core Commitment to Capacity that each institution is to demonstrate to become and remain accredited." The Special Visit confirmed the failure of New College to meet expectations for systems, processes, records, and staffing that make up basic operational infrastructure. As noted in the Special Visit report, transcripts of student records were not up to date or available to the team, and sufficient qualified and trained staff were not in place and sufficiently conversant with the electronic recordkeeping system to produce records. This situation has not been rectified. New College has been unable to process transcript requests regularly for a period of months, making it impossible for students and graduates to apply for admission or transfer to other institutions. The November visiting team also found that student files are incomplete and policies on grades and grading are lacking, making the integrity of the College's degrees and credits difficult to substantiate and verify.

Despite efforts of the transition team and faculty to rectify operational deficiencies by proposing policies and procedures and placing oversight with the faculty, operational integrity is still lacking. The Special Visit team was unable to discern any meaningful improvement in records and implementation of appropriate policies for admissions, enrollment, award of credit and grades, student services, and student files. A college-wide schedule of classes and catalog do not exist. Programs are offered on several different versions of the semester system, making control and planning impossible. Without funding for knowledgeable and well-trained staff to clean up records and past errors, and to ensure the adoption and implementation of processes in the future, basic operational capacity and integrity are lacking.

The Commission adheres to its statement in the July 2007 action letter that "[t]he failure to operate with appropriate policies, procedures, and processes constitutes a lack of operational integrity under Standard 1 (CFR 1.3, 1.7, 1.8) and indicates that New College does not comport with several other areas of the Standards (CFR 2.4, 3.2, 3.8, 3.11, 4.4)."

Academic Integrity and Quality. Related to operational integrity are academic integrity and quality. As noted in the July action letter, one of the "fundamental purposes of accreditation is to assure the public that degrees completed at accredited institutions represent the completion of a course of study that is 'appropriate in content and standards'(CFR 2.1)." The lack of oversight and processes to approve new programs and changes in curriculum has resulted in new programs

being offered without adequate planning and without WASC approval, offerings that do not meet WASC expectations for content and quality, and a lack of faculty-developed and shared expectations for student learning. The November visiting team found that the unchecked proliferation of options within the undergraduate degree in Humanities had resulted in the lack of a common core of courses and requirements that make up an “integrated course of study of sufficient breadth and depth to prepare [students] for work, citizenship and a fulfilling life.” (CFR 2.2)

New College does not have uniform standards in the undergraduate programs to ensure that students complete work that merits the award of credit, especially in low-residency programs and independent study, which were routinely used to create individualized programs of study without adequate oversight. As noted in the Special Visit team report, New College’s “[d]elays in posting grades, irregular program designations, and strange methods of accounting credit hours,” exacerbated by the “absent[ce of] published rules and curricular choices” make quality advising and proper sequencing of courses difficult or impossible. The lack of grading standards, resulting in excessively high grades, demonstrates that faculty has not established “expectations for learning and student attainment,” which are “clearly reflected in its academic programs and policies....” (CFRs 2.3 and 2.4) The team found no evidence that “expectations for student learning are embedded in the standards faculty use to evaluate student work.” (CFR 2.6) New College lacks a regular program review process and an undergraduate assessment plan, and some programs do not engage in any program-level assessment. (CFRs 2.6, 2.7) The faculty had begun addressing these deficiencies at the time of the Special Visit, but progress has been stalled because of the financial crisis.

Concerns about the academic quality and integrity of New College’s programs date back at least to 1985, when problems were cited about the content of general education, the coherence of the course of study, and the award of credit. The Commission confirms its finding, as set forth in the July 2007 action letter: “WASC Standards require that institutions have curricula that meet WASC Standards, that have been properly approved, and that are published for students and for the public in appropriate documents.... New College does not have and has not implemented formal processes for the review and approval of programs, program changes, or other basic elements of curricular design and integrity.” Thus, the Commission is not able to confirm the academic integrity and quality of New College’s programs. (CFRs 1.1, 1.8, 2.1-2.6, and 2.12).

Accountability, Decision Making, Governance, and Leadership. New College does not have a sufficient core of personnel in its administration and management, on the faculty or on the Board of Trustees to operate in keeping with the Standards, and has not demonstrated that its decision-making and governance systems and actions taken under those systems meet WASC Standards. As noted by the Special visit team, New College’s record reveals a pattern of operating without systems of accountability, structures, transparency, clear lines of reporting and accountability, and shared authority among the faculty, board and administration. (CFR 3.8-3.11)

After the July 2007 Commission action, New College’s then-president resigned and was replaced in September by an acting president who had served on the board. A small transition team of

temporary financial and academic personnel and consultants was retained. However, because of the financial exigency, a more permanent arrangement for a chief executive officer has not been made, despite efforts to identify and retain an experienced leader who would serve in an interim or more permanent capacity. While the acting president has retained a chief financial officer, other key leadership positions, such as a chief academic officer, are unfilled, as are key staff positions in areas such as student records and financial aid. At the time of the November visit, key positions were held by part-time personnel and consultants but since the end of November, when funds were no longer available to make payroll, few staff members or consultants remain. (CFR 3.1, 3.10)

Historically, the Board of Trustees has not exercised “appropriate oversight over institutional integrity, policies, and ongoing operations, including hiring and evaluating the chief executive officer.” (CFR 3.9) As noted in the Special Visit report, the board adopted presidential initiatives without requiring sufficient information to understand the full ramifications of these decisions. Traditional boundaries between board and administrative roles were not honored. The 2007 special investigation team cited the Board’s failure to conduct independent investigations of two matters that may have involved unethical conduct by administrators or board members. Evidence of the lack of board oversight can also be found in its handling of financial matters, including purchases of property and financial management. The November 2007 Special Visit team noted a lack of board “oversight of academic programs,” evidenced by inadequate needs assessment, logistical or academic planning, and assessment plans.

Since the November 2007 visit, two long-standing board members have resigned, and the board has met frequently to address the financial crisis and to develop the plan that was submitted shortly before the Commission meeting. The Commission values the efforts of the remaining board members to keep New College in operation; however, at this point, the new board does not have a sufficient record to demonstrate that it conforms to basic expectations for board oversight and authority under CFRs 3.5 and 3.9.

The New College faculty, which includes many talented and committed teachers, has not been empowered to play the expected role in guiding the academic programs. The Special Visit team found that a core of full-time or other active faculty members could not be clearly identified and that structures for the exercise of their authority were nonexistent or dysfunctional. A faculty handbook or comparable document had not been finalized or adopted by the faculty and board, and a model for faculty governance was only in the draft/discussion stage of development. The faculty’s efforts to remedy this unacceptable situation by convening a Faculty Council and drafting a proposed Faculty Council Charter in the fall were a good beginning, but have not been sustained given the enormity of the current financial challenges. Most programs did not resume classes as scheduled in the spring 2008 term, and the faculty has not been paid for more than three months. While the Faculty Council continues to meet each week with dozens of dedicated teachers in attendance, the financial crisis and its consequences consume all their time and there is no semblance of expected faculty activity. (CFR 3.1, 3.2, 3.11)

The Commission’s expectations for improvement by the time of this action are set forth in the July 2007 letter as follows: “New College will need to demonstrate at the time of the next visit

that it has in place the board and executive leadership that understands the magnitude and seriousness of these issues, appreciates the impact of these problems on the integrity of New College credit and degrees, and has instituted a clear set of strategies to address each of the matters raised in this letter.” New College does not have the personnel, organization, and structures in place to meet the Standards on accountability, governance and decision making. (CFRs 1.3, 3.1, 3.2, 3.8-3.11)

Commitment to WASC Accreditation and Substantive Change. In the months prior to the November 2007 Special Visit, the Commission and staff found that New College had established at least three new degree programs without proper advance approval by WASC through the substantive change process. New College had previously been warned about complying with substantive change procedures, as early as 1978. Implementing programs that constitute substantive change without receiving required approvals is a serious violation of WASC substantive change policy, federal regulations, and CFR 1.9. New College cooperated in conducting an audit of programs and voluntarily discontinued the programs that had not been properly approved.

As noted by the November 2007 Special Visit team, New College’s history with WASC is characterized by a pattern of crisis or sanction, change just before a WASC visit or report, and a return to past practice and sanction again, often for the same kinds of issues and deficiencies for which change was said to have been made. As noted by the Special Visit team, the community voiced “a strong desire to retain accreditation.” However, the team also noted that “there is little foundation to support the massive and complex changes that the institution must undergo and sustain” to retain accreditation.

The November team report called on New College to “determine whether accreditation by WASC is essential to the College and consistent with its Mission....” The New College letter of January 30 states that the board, transition team and faculty “are all in agreement with the commitment to adhere to and operate in full compliance with WASC accreditation Standards” The New College board plan of February 15 reiterates the commitment to WASC and states that the board intends “to stabilize the College as a normally functioning member of the family of WASC-accredited institutions.” These statements were reiterated in discussions with the Commission at its February 21 meeting. While the Commission does not doubt the sincerity of these statements, the desire for accreditation is not the same as demonstrating the capacity of the institution to meet WASC Standards. New College’s failure to meet so many basic tenets of accreditation requires that accreditation be terminated. WASC can no longer validate to the public and the community of higher education that New College is a financially sustainable institution and has a basic infrastructure of academic, operational, financial and governance systems, structures, and policies.

Commission Action

Therefore, the Commission acted to:

1. Terminate the accreditation of New College.
2. Set the effective date of termination to be 30 days from the receipt of this letter.
3. Provide a basis to allow completion of student work as accredited in specified courses and programs in which students are enrolled as of February 21, 2008 to the end of the spring 2008 term, but no later than June 30, 2008, under the following conditions:
 - a. The College must submit, within 15 days from the date of receipt of this letter, an acceptable plan that documents which courses will continue to be taught through the end of the spring semester 2008. The plan must include the following specific information:
 - i. The names of the courses and the schools or departments that are offering them;
 - ii. The starting and ending dates of the courses in question;
 - iii. The syllabus for each course currently underway and to be completed, indicating the course requirements and the required student work for credit and grade to be assigned;
 - iv. The names of the faculty members teaching these courses, identifying whether they are full-time or adjunct;
 - v. The names of each student enrolled in each course;
 - vi. The name of each student who will be graduated at the end of the spring term upon completion of the course or courses in which he or she is currently enrolled, and the program from which the student will be graduated;
 - vii. A plan for updating the records of academic credit and issuing transcripts for these courses at the end of the term;
 - viii. A plan demonstrating that the college has the financial capacity to continue instruction in these courses through the end of the spring term.
 - b. The WASC staff will review and make a determination on the acceptability of the plan as soon as possible after receipt.
4. Require that New College submit a plan for the transfer of remaining students and transfer or closing of remaining programs that will not be continued at New College, within 30 days of receipt of this letter, including a plan for completing and issuing transcripts for any student seeking to transfer or move to another institution. WASC will review this plan and consider it for approval.
5. Request that New College make arrangements for the permanent disposition of student records so that students and alumni are able to obtain accurate and complete transcripts in the future. New College should inform Commission staff of the plan for disposition of these records.
6. Require that this action letter be distributed to the full Board of Trustees, all full-time faculty and staff, to any other faculty and staff members with significant leadership roles,

and to all students within 30 days of receipt, and that verification of such publication be provided to WASC no later than 35 days of receipt of this letter.

7. Require that any students admitted to New College after the effective date of termination of accreditation be informed in writing that New College is no longer accredited by WASC.

The WASC staff will be available to you to discuss the outcome of this action and the steps that the Commission expects you to take in the coming months.

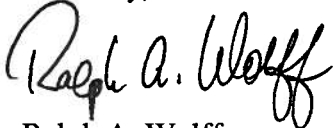
Termination of accreditation is a negative action as defined in the 2001 *Handbook of Accreditation*. It is subject to the right of Commission review and subsequent appeal through the Western Association of Schools and Colleges. A copy of the Commission Review Process is enclosed. Please note that any request for review must be received within the time frame set forth in the Review Process and must be accompanied by the required fee. Information about fees may be obtained from the Commission's Web site. Staff can discuss with you the procedures for the review process.

Commission policy provides that in the case of a public negative sanction, a public statement will be prepared in consultation with the institution for response to inquiries. The Commission reserves the right to make the final determination of the nature and content of the public statement. Enclosed is a copy of a draft public statement. Any comments you wish to make should be received in this office within 24 hours after receipt of this letter since the decision will be available to the public after that time.

If New College of California determines that it wishes to seek WASC accreditation in the future, it will be required to wait for one year from the date of this letter before applying for Eligibility.

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

Sincerely,



Ralph A. Wolff
President and Executive Director

RW/aa

cc: Sherwood Lingenfelter
Board Chair
Members of the team
Teri Cannon

DRAFT

PUBLIC STATEMENT ON NEW COLLEGE OF CALIFORNIA

At its meeting on February 20-22, 2008, the Accrediting Commission for Senior Colleges and Universities acted to terminate the accreditation of New College of California. An institution's accreditation is terminated when an institution has been found out of compliance with one or more of the Commission Standards.

The Commission reviewed New College of California under the WASC *2001 Handbook of Accreditation* and found that the College was not in compliance with elements of all four of the WASC Standards for Accreditation: Standard 1 (Defining Institutional Purposes and Ensuring Educational Objectives), Standard 2 (Achieving Educational Objectives through Core Functions), Standard 3 (Developing and Applying Resources and Organizational Structures to Ensure Sustainability), and Standard 4 (Creating an Organization Committed to Learning and Improvement).

This action was taken following a Special Visit conducted on November 12-14, 2007. New College was placed on probation by the Commission at its meeting on June 20-22, 2007 following a special investigation visit in May 2007 and a review of an interim report submitted by New College in fall 2006, which was reviewed by the WASC Interim Report Committee in March 2007.

This action is subject to a right of review under the WASC Policy on Commission Review Process.

The Accrediting Commission for Senior Colleges and Universities accredits 157 baccalaureate and graduate degree-granting institutions in California, Hawaii, Guam and the Northern Marianas Islands. The Western Association of Schools and Colleges is one of seven regional accrediting commissions and is recognized by the United States Department of Education.

This statement has been reviewed and approved by the institution.

Date: _____

February 26, 2008