March 28, 2011

Donald Straney  
Chancellor  
University of Hawaii, Hilo  
200 West Kawaihae Street  
Hilo, HI 96720-4091

Dear Chancellor Straney:

It has come to WASC’s attention that the University of Hawaii, Hilo has been offering several distance education programs without appropriate WASC approval. As reported to WASC by April Komenaka Scazzola, the Accreditation Liaison Officer to WASC, on March 9, 2011, the following programs were implemented without the required substantive change approval:

- Bachelor of Arts in Communication  
- Master of Science in Clinical Psychology  
- Master of Arts in Indigenous Language and Culture Education  
- AA to BA in Psychology  
- RN to BSN

We appreciate Dr. Komenaka Scazzola’s efforts to bring this issue to light and to take steps to remedy the situation.

Implementing programs (constituting substantive changes) or admitting students into a program that has not been approved is not only a serious violation of WASC substantive change policy and federal regulations; it is also a violation of Standard One. Criterion for Review 1.9 states:

*The institution is committed to honest and open communication with the Accrediting Commission, to undertaking the accreditation review process with seriousness and candor, to informing the Commission promptly of any matter that could materially affect the accreditation status of the institution, and to abiding by Commission policies and procedures, including all substantive change policies.*

Institutions have a fiduciary responsibility to WASC and to their students to receive requisite approvals before commencing programs. WASC has a legal responsibility to the U.S. Department of Education to assure the integrity of its accredited institutions and to assure that programs have received the necessary prior approvals.
If non-compliance with substantive change policy occurs again, the matter shall be referred to
the Commission for consideration of a sanction for the entire institution for violation if its
responsibilities under Standard One, Institutional Integrity.

The distance education programs listed above must be reviewed and approved by the Substantive
Change Committee and the Commission, as called for by Commission policy. In the meantime,
all new enrollments in these programs must cease until the programs are approved.

Before action will be taken to approve these programs, I am requesting the University’s response
to the following issue within 30 days of the receipt of this letter.

- Clarification of the circumstances in which the programs noted above were launched
  without receiving required substantive change approval.

- An audit of all of the University’s distance education programs to determine whether all
  such programs have received the requisite approvals from WASC. If there are any
  additional programs that need approval, we need to be notified and the programs need to
  be submitted immediately for approval.

- Identification of the processes in place or to be put in place to ensure that all future
distance education programs are submitted to the Substantive Change Committee in a
  timely manner and prior to the program implementation date.

- Explanation of internal controls put in place to ensure that enrollments in all off-campus
  and distance education programs are consistently and accurately monitored and reported
to WASC.

The response to these questions will be reviewed by Richard Osborn, your staff liaison.

Furthermore, procedures for monitoring implementation of new distance education programs
will be part of the institution’s CPR review in Fall 2013.

We hope that the University will take appropriate steps to avoid this circumstance in the future.
Please feel free to contact me or Richard Osborn should you have any questions.

Sincerely,

Ralph A. Wolff
President and Executive Director

cc: April R. Komenaka Scazzola, Interim Dean, College of Continuing Education &
Community Service and WASC ALO, UHH
Richard Osborn, Vice President, WASC