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March 28, 2011

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PRESIDENT
Ralph A. Wolff

Donald Straney
Chancellor
University of Hawaii, Hilo
200 West Kawili 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 of 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.

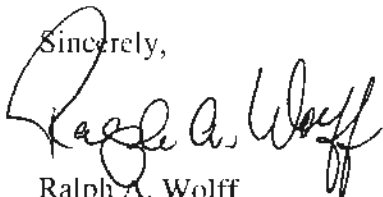
- Clarification of the circumstances in which the programs noted above were launched without receiving required substantive change approval.
- An audit of all of the University's distance education programs to determine whether all such programs have received the requisite approvals from WASC. If there 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

April 13, 2011

Ralph Wolff, President and Executive Director
Western Association of Schools and Colleges
Accrediting Commission for Senior Colleges and Universities
985 Atlantic Avenue, Suite 100
Alameda, CA 94501

Dear Mr. Wolff,

We acknowledge receipt of the commission's March 28, 2011 letter informing us that we are out of compliance with WASC Standard 1.9 and that several of our programs must undergo substantive change review.

These are:

- Bachelor of Arts in Communication
- AA to BA in Psychology
- RN to BSN
- MA in Indigenous Language and Culture Education (ILCE)

The commission's letter refers to the "Master of Science in Clinical Psychology." This is the result of a miscommunication that occurred as our ALO discussed the situation with WASC staff; the proposed Master of Science in Clinical Psychopharmacology is in fact undergoing substantive change review as a distance learning program in June 2011. Our MA in Counseling Psychology is a traditional on-campus program.

Applications for substantive change review for all four programs have been submitted to the substantive change officer along with payment of the application fees. We have requested the earliest possible date for review for these programs and anticipate September 2011 review of the RN to BSN and AA to BA in Psychology and October 2011 review for the BA in Communication and the MA in ILCE.

Clarification of the circumstances in which these programs were launched without receiving required substantive change approval. All of these programs were implemented before the current ALO was appointed. In the case of the AA to BA, online since fall 2002, and the RN to BSN, online since 2004, it was the understanding of the then-ALO that the 50% criterion applied to all course requirements for a degree, including non-program electives and General Education. The BA in Psychology has required 41 credits, a third of the 120 credits required for a BA; and the RN to BSN online has required a minimum of 24 credits, a fifth of the 125-129 credits required for the BSN.

The BA in Communication has never identified or promoted itself as an online or distance learning program, and virtually all of its majors are on-campus students. Over the years, a few Communication faculty have voluntarily begun to offer an increasing number of online courses, and it is now possible for a student to complete all major requirements except Public Speaking online. Thus the Commission has determined that the BA in Communication must submit a substantive change proposal as an online program.

The MA in Indigenous Language and Culture Education has from the outset in 2006 served teachers on other islands as well as those on Hawai'i Island, and employs a combination of videoconferencing and offsite visits to deliver all of its courses. In this case, the program was not aware that a substantive change review was required. There is no mention of online or videoconferencing in the catalog description of the program, and the university administration and ALO were not aware until two weeks ago that the program was being delivered in this nontraditional format.

Audit of all of the university's distance education programs. In addition to the four degree programs described above, the university has offered a one-cohort online secondary teacher education certificate program that will terminate at the end of the current semester. This is not a degree program, and the current ALO received confirmation from the then-substantive change coordinator in 2009, before the program was begun, that as a certificate program it did not require substantive change review.

UH Hilo currently has no off-campus degree programs, but should these develop, they will undergo substantive change review as appropriate.

Several new online degree programs are being proposed by the university, and all are either scheduled for substantive change review or are in the process of applying for review: the MS in Clinical Psychopharmacology and the Doctor of Nursing Practice are scheduled for June 2011 review, and the Master of Arts in Teaching is requesting review in December 2011.

Processes to ensure that all future distance education programs are submitted for substantive change review in a timely manner and prior to implementation. The university system requires that all new degree programs undergo a two-phase review process: the request for authorization to plan (ATP), which culminates with authorization by the chancellor; and the program proposal itself, which culminates with program approval by the Board of Regents.

The ALO receives notification from the campus curriculum coordinator of every request for ATP as it is being prepared, and receives sufficient information to determine whether a degree program is or is not a distance-learning program or in any other way departs from the traditional classroom on-campus format. This is typically six months to a year

Ralph Wolff, President and Executive Director

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before a proposal goes before the Board of Regents, enough time for any qualifying program to apply and prepare for a substantive change review. Moreover, the Graduate Council now encourages programs to draw on the appropriate WASC substantive change proposal template to develop their proposals for the system, in particular those programs that will be undergoing WASC substantive change review.

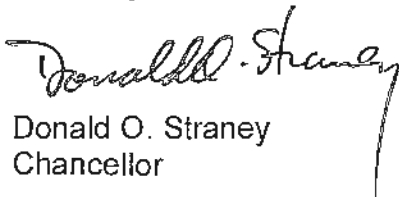
The ALO works with all programs preparing substantive change proposals.

To avoid situations like that of the BA in Communication, which drifted over time into DL status without substantive change review, the following steps will be taken. First, all departments offering any online courses will be notified of the 50% rule. Second, the DL Coordinator will track the offering of completely online courses department by department each semester and report these data to the ALO. The ALO will advise departments approaching the DL criterion point so that they can decide whether to reduce online offerings or to go forward for substantive change review.

Internal controls in place to ensure that enrollments in all off-campus and distance education programs are properly monitored and reported to WASC. The Distance Learning Coordinator works with the AA to BA Psychology and RN to BSN programs and with the Admissions and Records offices to track enrollments, to assist and support students in registration and access of student services, and to monitor student completion and retention. The university system's Banner student registration and information system provides data on completely online courses and courses delivered by other technologies. These tracking services have recently been extended to the MA in ILCE and will be extended to Communication online courses as well as the new distance education programs.

Resulting data for all distance education and off-site degree programs will be provided to WASC by the ALO.

Sincerely,



Donald O. Straney
Chancellor

cc: Richard Osborn, Vice President
WASC Senior College Commission