July 10, 2013

Robert G. Humphreys, Sr.
President
Humphreys College
6650 Inglewood Avenue
Stockton, CA, 95207

Dear President Humphreys:

At its meeting June 20, 2013, the Commission considered the report of the Educational Effectiveness Review (EER) team that conducted the visit to Humphreys College (Humphreys) March 5 – 8, 2013. The Commission also had access to the Educational Effectiveness Review (EER) report prepared by Humphreys College prior to the visit, the institution’s May 13, 2013, response to the visiting team report, and the documents relating to the Capacity and Preparatory Review (CPR) visit conducted in March 2011. The Commission appreciated the opportunity to discuss the review with you, Dean of Instruction Robert Humphreys Jr., Dean of the Law School Patrick Piggott, and Dean of Institutional Research & Effectiveness Jess Bonds. Your comments were helpful in informing the Commission’s deliberations.

Humphreys College’s Institutional Proposal outlined two themes for the comprehensive review: ensuring educational effectiveness and planning growth. Humphreys College took the review seriously and sustained momentum from the CPR through the EER to fully engage the themes and meet several of the intended outcomes.

The Commission’s action letter of July 5, 2011, highlighted four areas for the College’s attention and development by the time of the EER. The Commission stressed the need to extend the educational effectiveness systems in place at the undergraduate level to graduate programs. Of particular concern was the law school’s slow progress in developing and implementing student learning assessment, a point of emphasis raised repeatedly by the Commission over the past five years. Second, the Commission expected tangible progress building administrative staffing, particularly institutional research capacity, that would support effective data gathering, analysis, interpretation, and dissemination. Third, Humphreys needed to address heavy staffing responsibilities and faculty workloads that put effectiveness at risk. Finally, the Commission urged the College to “…move strategically...to establish a clear and sustainable vision of its distinctive identity.”

Humphreys College addressed these areas in a thorough manner that included evidence of genuine progress. The Commission commends the College for the following achievements:
Graduate Programs Assessment. As highlighted in the team report, the Master of Arts in Education “...is now a well-conceived, well-executed, and carefully assessed program.” The team also reports good progress in the law school “...building a comprehensive and systematic plan for educational effectiveness.” It is important that the law school capitalize on the faculty’s growing enthusiasm to continue this work and learn from the process.

Administrative Staffing and Institutional Research. Humphreys has increased information technology (IT) staffing and built capacity in institutional research as well as retention and assessment. While the College is building an assessment plan for its academic support programs, however, staffing in this area remains a concern.

Faculty Diversity. Humphreys College has significantly improved faculty diversity since the CPR. Four of the eight new full-time faculty are of diverse races and ethnicities.

Creativity and Fiscal Responsibility. Creative problem-solving and fiscal responsibility are signature traits of the College. The team was impressed with the law school’s incubator project designed to help graduates either grow their own law practices or gain experience that they can use in finding employment opportunities. The team was also impressed by the College’s long history of fiscal responsibility, “using creativity to maximize efficiency and minimize cost. When the College lost its 2013-2014 Cal grant funding because it missed the newly established state student loan default rate threshold by .1% (the state mandate is 15.5% or below; the Humphreys College rate was 15.6%), the College developed a scholarship program so that students would not have to fully bear the consequences of this new financial burden. The College determined that long-term revenue losses from students no longer able to continue their education would be significantly greater than this short-term retention expense. And, the team learned after the visit that because of the College’s efforts to help graduates get into loan repayment plans it lowered its student loan default rate and will be eligible for Cal grant funding for fall 2014.

Retention and Graduation Rates. Of particular note, the College’s three-year average of overall six-year graduation rates for undergraduates is 52%. The team concluded that this rate is acceptable given that many Humphreys College students reflect characteristics known to correlate with lower undergraduate completion. Nonetheless, the Commission urged that efforts to increase these completion rates for all students be continued.

The Commission also endorsed the recommendations of the EER team and emphasized the following areas for further attention and development:

Law School Assessment and Bar Pass Rates. As highlighted in the team report, the law school needs to complete an assessment of the remaining six program learning outcomes and, more importantly, ensure that assessment becomes an enduring aspect of faculty culture and program norms. This should include an assessment plan that fosters embedded assessment methods to assess both course-level and program-level learning outcomes and a timeline for regular future program reviews, as well as follow-through on findings (“closing the loop”), and linking the budget or other resources to support needed changes and improvements. (CFRs 2.4, 2.7, 4.4, 4.7)
The team highlighted their concern for the law school’s recent low bar pass rates. These rates and the state bar’s new cumulative bar pass standard mean the law school will “likely be found out of compliance with the new state bar requirement.” Institutions must demonstrate a 40% pass rate among graduates who have completed their program within the past five years and taken the bar one or more times. The team calculated the cumulative pass rate for Humphrey’s graduates from 2008 through 2012 at 33.9%. The law school has three years to bring its rate into compliance or risk losing state bar accreditation. The Commission, in highlighting this concern also noted that state bar approval is an eligibility requirement for the Commission to continue to include the accreditation of the law school. Thus, immediate steps need to be taken to ensure that state bar accreditation is retained. (CFRs 2.6)

**Faculty Workload.** Humphreys has become “…an institution in transition from an emerging to developed culture of inquiry making evidence-based decision-making.” The team found that the College has a dedicated faculty and staff committed to student success. The team also noted that some advising loads are heavy, and the full-time teaching loads, scheduled across four quarters, with limited discretionary time between terms, left little space for faculty scholarship. Humphreys “needs to make sure human resources are as well cared for as its physical and fiscal resources.” (CFRs 2.8, 3.1, 3.2, 3.3)

**Migration to the New Enterprise Software System.** While system migration is adding to staff workloads, the team reports that some stress will be alleviated when the project is complete and staff benefit from the efficiencies of the new program. The team noted that the “College is on a tight timeline for completion of the migration, yet it is important that the College meet their deadlines.” It is also important that the College take the time and provide the training and support needed to make sure the new system maximizes accuracy and efficiency. (CFRs 3.7, 4.5)

**Planning to Sustain the Humphreys College Vision.** As highlighted in the team report, the Humphreys College mission is to provide access to students who otherwise might not be able to afford a college education. With the College’s current strategic plan extending only to 2014, the Commission urged Humphreys to use a new strategic planning process to attend to its own changing environment. Federal and state grant programs that have historically been a significant part of the College’s financial framework may be less available. Fundraising or other revenue sources may be needed to offset the loss of government funds. The team observed that “…the role of president may evolve …” to address this changing climate.

**The Need for a Separate CFO.** The team noted in its CPR report two years ago and again in its EER report that expanding responsibilities could affect the president’s ability to serve effectively as both chief executive officer (CEO) and chief financial officer (CFO). The Commission noted that according to Standard 3, the institution must have a full-time chief executive officer and also a chief financial officer whose primary or full-time responsibility is to the institution and who is other than the CFO. The current arrangement, therefore, will need to be changed to address Commission Standards. (CFRs 4.1, 4.2, 4.3, 3.10)
In light of the findings from the EER visit to Humphreys College, the Commission took the following actions:

1. Receive the Educational Effectiveness Review report.

2. Reaffirm the accreditation of Humphreys College.

3. Schedule the next comprehensive review with the offsite review in spring 2019 and accreditation visit scheduled for spring 2020.

4. Request an Interim Report in spring, 2015 on the following issues cited in this letter and the EER team report: 1) the law school assessment plan and cumulative bar pass rate, and the law school’s standing with the state bar, 2) faculty teaching and advising workloads, 3) the enterprise software system migration, 4) the new strategic plan, and 5) the separation of the College’s CEO and CFO roles. Progress should be demonstrated, as defined above.

In taking this action to reaffirm accreditation, the Commission confirms that Humphreys College has satisfactorily addressed the three Core Commitments to Student Learning and Success; Quality and Improvement; and Institutional Integrity, Sustainability, and Accountability, and has successfully completed the three-stage review conducted under the 2008 Standards of Accreditation. Between this action and the time of the next review, the institution is encouraged to continue its progress, particularly with respect to student learning and success.

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


As Humphreys College works on the issues cited above, it should be mindful of the expectations that it will need to meet at the time of its next comprehensive review, which will take place under the revised Standards of Accreditation and institutional review process in the 2013 Handbook of Accreditation. These expectations build on past practice and will include, for example, student success, quality improvement processes such as assessment and program review, planning, and financial sustainability. However, the 2013 Handbook also includes new foci: the meaning, quality, and integrity of degrees; student performance in core competencies at the time of graduation; and more visionary institutional planning for the “new ecology” of learning. Humphreys will be well served to familiarize itself with the 2013 Handbook and to approach its challenges in ways that will address both previous and current expectations.
Finally, the Commission wishes to express its appreciation for the extensive work that Humphreys College undertook in preparing for and supporting this accreditation review. WASC is committed to an accreditation process that adds value to institutions while assuring public accountability, and we are grateful for your continued support of our process.

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

Sincerely,

Ralph A. Wolff
President

RW/ge

Cc: Harold Hewitt, Commission Chair
    Jess Bonds, ALO
    Ronald Guntert, Jr., Board Chair
    Members of the EER team
    Maureen A. Maloney, WASC Staff Liaison