July 3, 2012

Charles House
Chancellor
Cogswell Polytechnical College
1175 Bordeaux Drive
Sunnyvale, CA 94089

Dear Chancellor House:

At its meeting June 13-15, 2012, the Commission considered the report of the Special Visit team that conducted an on-site review of Cogswell Polytechnical College (Cogswell or CPC) March 21-23, 2012. The Commission also reviewed the Special Visit report submitted by the College prior to the visit and your response to the team report, dated May 16, 2012. The Commission appreciated the opportunity to discuss the visit with you and Charles Cook, board chair. Your observations were very helpful in informing the Commission’s deliberations.

This visit was requested by the Commission following a Special Visit in November 2010. That 2010 visit coincided with the purchase of the College by Palm Ventures, and as the February 28, 2011 Commission action letter noted, “some of the necessary and important changes still in progress at the time of the visit [would] require some time before progress and improvement [could] be evaluated” and “it was too early to observe the implementation of the change of ownership during the visit.” This Special Visit was scheduled for spring 2012 to review Cogswell’s progress on the following issues: implementation of the change of ownership and governance; financial sustainability and management; strategic planning; and assessment of student learning and program review.

Progress was made on each of these four areas during this time of transition, but further work remains, as discussed below. In addition, the visiting team reported considerable difficulty accessing important information and evidence to support the institution’s report. The Commission expects Cogswell to take steps to better organize and present evidence and supporting documents in future reports to WASC. (CFRs 1.9, 4.3, 4.5, 4.6)

The Commission endorsed the findings, commendations, and recommendations of the Special Visit team, and highlighted the following issues for continuing attention.

**Continuing development of sound governance.** As highlighted in the team report, “the College is in the early stages of a major turn-around effort.” The Commission notes the progress made since the change of ownership, such as the constituting of the new governing board and the creation of a cross-functional team structure at the College. As the team report notes, however, “the turn-around will be successful if there is an appropriate balance between the academic and business cultures wherever the dynamic tensions between these cultures are confronted.” Among the challenges to this balance, the Commission noted the extensive involvement of the board in the operation of the College and the lack of a clear role for the faculty. The Commission expects the College to complete the development of its new governance structure and decision-making processes, including appropriate roles for the board and the faculty, and to ensure that
appropriate leadership positions are filled as soon as possible. The Commission was encouraged by recent steps taken to hire for key positions and by emerging plans for a greater role for faculty in governance, noted in your letter of May 16, 2012. (CFRs 1.3, 1.6, 3.8-3.11)

Achieving financial sustainability and improving financial management. The Commission has long been concerned about Cogswell’s financial sustainability, and is hopeful that with the financial resources and long-term commitment of the new owners, Cogswell can achieve financial health. As emphasized by the team, “The financial position of [the] College changed dramatically” when it was purchased by Palm Ventures, and is “stronger than its predecessor entity.” Among the positive indicators are the infusion of cash related to the acquisition, the revaluation of property, a bank-provided line of credit, and the settlement of a pending lawsuit. However, the Commission also recognizes that Cogswell has not achieved surpluses for the last two years and projects another operating loss for fiscal year 2012. The Commission expects the College to develop operating budgets with realistic enrollment goals and financial projections for the next three years so that it can demonstrate that it will become financially viable within a short time. (CFRs 1.8, 3.5, 3.10, 4.2)

Developing and implementing a strategic plan. Closely related to Cogswell’s turnaround is the need for a sound and evidence-based strategic plan to guide Cogswell’s recovery. The team found that “Cogswell has a nascent strategic planning process, but no meaningful plan in place… [and that] it does not have experience in the development and discipline of using a strategic plan….” Nevertheless, the team expressed confidence that the new leadership and key members of the College community will create a strategic plan within the next six months. The Commission shares the team’s caution that the College’s “singular focus on returning to a positive revenue situation” does not mitigate WASC expectations for strategic thinking and planning. The Commission was encouraged to learn that the completion of Cogswell’s formal strategic plan is imminent and it expects this plan to be implemented as planned and monitored carefully. (CFRs 4.1- 4.3)

Assessing student learning and conducting program review. WASC expects that “all programs offered by the institution are subject to systematic program review.” The team found that Cogswell had only a rudimentary program review process, which lacked guidance on the role of external reviewers and did not include the use of comparative data. Further, scheduled program reviews for this year were not likely to be completed in a timely fashion. The team also concluded that only three of the seven programs conduct “thorough and comprehensive assessments” despite the fact that the faculty and program directors are genuinely engaged with assessment of program-level student learning. The College is expected to have a well-developed program review process, completed program reviews, and an updated program review schedule by the time of its next WASC review and be able to demonstrate that the results of assessment and program review are being used for improvement. (CFRs 2.6, 2.7, 4.4, 4.5)

The Commission acted to:

1. Receive the Special Visit Report and continue accreditation.

2. Reschedule the next comprehensive review, with the off-site review in spring 2014 and the visit tentatively scheduled for fall 2014.

In accordance with Commission policy, a copy of this letter will be sent to the chair of Cogswell Polytechnical College’s governing board in one week.

In keeping with WASC policy adopted in November 2011, this letter and the underlying team report also will be posted on the WASC website in approximately one week. If you wish to post a response to the letter and/or team report on your own website, WASC will also post a link to that response on its website. Any link that you wish to provide should be forwarded to the attention of Teri Cannon so that it may be included on the WASC website. As noted in the Commission policy, team reports and action letters are foundational for institutional accountability and improvement. Institutions are expected to disseminate these documents throughout the institution for the purposes of promoting ongoing engagement and improvement and encouraging internal communications about specific issues identified in team reports and action letters.

Finally, the Commission wishes to express its appreciation for the extensive work that the 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/dh

cc: Linda Johnsrud, Commission Chair
    Timothy Duncan, ALO
    Charles Cook, Board Chair
    Members of the Special Visit team
    Diane Harvey, Vice President and WASC Liaison