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March 7, 2011

Gary Dei Rossi  
Chief Executive Officer  
Teacher's College of San Joaquin  
Professional Development Center  
Stockton, CA 95206

Dear Dr. Dei Rossi:

At its meeting February 16-18, 2011, the Commission considered the report of the Capacity and Preparatory Review (CPR) team that conducted a visit to Teachers College of San Joaquin (TCSJ) on October 20-22, 2010, as part of TCSJ's advancement to candidacy. The Commission also reviewed the College's CPR report and exhibits, its response to the visiting team's report, the April 2009 action letter that followed the Eligibility review, and the College's fall 2009 Letter of Intent. The Commission appreciated the opportunity to discuss the review with Dean Catherine Kearney; Director of Institutional Research, Sylvia Turner; and Chair of the Master's Core, Diane Carnahan. The updates and information that were provided and their observations about TCSJ's plans for the future were very helpful.

In April 2009, the Eligibility Review Committee (ERC) found that Teachers College of San Joaquin met all 23 eligibility criteria. At the same time, the ERC noted several areas that warranted continuing attention. These included Criterion 4: Governing Board; Criterion 5: Chief Executive Officer; Criterion 9: Degree Programs: Quality; Criterion 10: Educational Objectives; Criterion 14: Faculty; Criterion 17: Information and Learning Resources; Criterion 19: Financial Accountability; Criterion 20: Institutional Planning; and Criterion 21: Institutional Evaluation and Assessment of Student Learning. The College's CPR report and the visiting team's report focused on Criteria 9, 10, 14, 17, 20, and 21. In its review, however, the Commission has also considered governance and institutional leadership, which relate to Eligibility Criteria 4 and 5 and are also essential elements of the WASC Standards of Accreditation, in particular Standards I and III.

The team found TCSJ's CPR report thorough and responsive to the Standards and Criteria for Review, providing abundant evidence of preparedness for candidacy. The team commended TCSJ for 1) dedication to its mission and vision; 2) the commitment of faculty to integration of theory with practice; 3) visionary leadership; 4) skillful management of financial resources in a difficult economic climate; and 5) strong support from the local educational community. In preparation for the CPR, the College had identified a list of nine "needs," which included faculty policies and processes, strategic and assessment planning, and expansion of library resources. The College was following up on these needs at the time of the visit, and the team commended TCSJ for approaching the review as an opportunity to focus on substantive issues and further its development.

The team made the following recommendations: 1) follow through on the nine "needs," with particular attention to a faculty diversity plan and expansion of library and information resources; 2) develop a teach-out plan to protect students in the event of

termination of the program; 3) develop and implement program review; 4) develop a comprehensive strategic and financial plan, to include a contingency plan in the event the state reduces block grants; and 5) prepare or complete needed policies, procedures and other documents identified in the Compliance Audit.

The Commission endorses the recommendations in the CPR team’s report and urges the College to consider them carefully. In addition, the Commission wishes to emphasize the following areas for attention and development.

**Appropriate Board Governance.** With regard to Criterion 4: Governing Board, the 2009 Eligibility letter notes that the College’s governance structure, comprised of an elected board governing the San Joaquin County Office of Education (SJCOE) and an advisory board to oversee the College, is “somewhat unique.” The letter states that while the Eligibility Review Committee panel was satisfied that the county board has the scope of authority to govern the College’s work, the role of the advisory board in planning and accountability would be “critical.” The letter goes on to say that in subsequent reviews, it will be essential for the College to demonstrate that its advisory board is engaged and effectively helping the College to meet its mission. The Commission agrees, but believes that further steps must be taken.

The question of where, ultimately, authority for the College resides is critical, and at present there is considerable ambiguity about the answer. The team report states that the SJCOE Board “does not, by law or custom, have any authority or responsibility” for matters relating to the College. This is corroborated by the *Bylaws* of the county board, which are derived from state law and describe board responsibilities at some length but make no mention of the College. Yet the board’s *Bylaws* also state – and the College’s CPR report affirms – that the SJCOE Board bears ultimate legal authority for the SJCOE, of which TCSJ is a part.

The College’s advisory board consists of thirteen members. They are appointed by the county Superintendent of Schools, who, like members of the county board, is also elected. According to the College and the team, the advisory board is closely involved in determining the mission and direction of the College. The team was unable to locate minutes of advisory board meetings, however. Thus it was impossible for the team to document what role the advisory board plays, for example, in such traditional acts of governance as approving budgets or evaluating leadership. According to the College’s report, the advisory board “contributes” to evaluation of the College’s leadership.

Ultimate authority for the College, then, appears to reside with the Superintendent, who is a member of both the SJCOE Board and the advisory board, in addition to appointing the members of the advisory board. According to the College’s report, TCSJ enjoys both “appropriate autonomy” and “valuable interconnectedness with SJCOE.” Relations between the SJCOE, the Superintendent, and the College are cordial, and at present this arrangement appears to work smoothly. The governance structure is, however, problematic and raises questions about potential conflicts of interest and the College’s autonomy – or indeed continued existence – if, for example, a SJCOE Board or Superintendent were elected that did not support the work of the College. The Commission is not comfortable with the possibility that exclusive governance authority may reside with one individual, the Superintendent, who is an elected official. The Standards require that “The institution has an independent governing board ... that, consistent with its legal and fiduciary authority, exercises appropriate oversight over institutional integrity, policies and ... operations, including hiring and evaluating the chief executive officer.”

The Commission therefore expects the College to create a governing board that operates independently from the Superintendent and bears full legal and fiduciary responsibility for the College. If the governing

board is to be the advisory board, then, at a minimum, the current advisory board must be vested with appropriate authority and develop a set of *Bylaws* that codify its authority, role and responsibilities, including a delineation of the roles of the advisory board and the Superintendent, the advisory board’s independence, and its singular focus on the well-being of the College. If the governing board is to be the San Joaquin County Board of Education, then the *Bylaws* of the Board of Education need to specify that its responsibilities include oversight of SJCOE’s administration of the College, contrasting its governing responsibilities to those of the Superintendent. The Commission expects to see significant progress in the area of governance at the time of the Educational Effectiveness Review (EER), in order for the College to comply fully with Standards I and III. (CFRs 1.3, 1.6, 3.8, 3.9)

**Strategic Planning.** The College was created in response to a need, and not as a result of long-term planning. While this responsiveness is commendable, careful strategic planning will be essential to the College’s continued progress. Thus the visiting team was pleased to learn that an advisory board member had already been identified to lead development of a strategic planning process in the near future.

Such planning should take into account the programming the College will offer; the resources (including faculty, other personnel, and library/information resources) that will be required to support that programming; the assessment and program review processes that will be needed to document and enhance educational effectiveness; and not least of all, the financial resources that will be necessary to support programs at an acceptable level of quality. Targets, indicators of success, timelines, specific steps, and lines of responsibility for implementation should be identified.

In its report, the team suggested that as part of the strategic planning process “the benefits and risks of the present organizational structure be among the factors considered,” noting that “alternative structures . . . might afford TCSJ a degree of security and sustained independence beyond what is possible in its present organizational environment.”

At the time of the EER visit, the Commission expects to see significant progress on strategic planning, with full engagement of the advisory board and with special attention to the areas of programming, finance, and governance. At a minimum, a draft of the strategic plan, linking strategic planning to academic, financial, information resources, and other planning in specific and persuasive detail, should be available to the team at the time of the EER visit. (CFRs 1.6, 3.5, 3.9, 4.1-4.3)

**Financial Management and Oversight.** The CPR team reported that the impact of the recession on the College appears to have been positive, at least thus far, as both employed and unemployed teachers are seeking to enhance their employability and earning potential. However, the economic outlook remains uncertain, the College is at least partially dependent upon block grants from the State of California, and the current state budget crisis is likely to have an impact on the College that cannot be fully foreseen.

Financial management is one of the areas in which there is considerable “interconnectedness” with the SJCOE. Distinct TCSJ financial data do not appear within the SJCOE budget, and while the SJCOE has annual independently audited financial statements that include TCSJ’s financial *transactions*, TCSJ does not have its own separate and audited financial statements, nor are TCSJ’s financial *accounts* separately identified in SJCOE financial statements. Consequently, it is unclear what kinds of reports either the SJCOE Board or the advisory board receives regarding the College’s finances. As the team report notes, “TCSJ’s financial accounts should be clearly and separately identified” within the SJCOE budget. This will be an important step to assure both accountability and sufficient support for the College’s own priorities (CFR 3.5, 4.2).

**Assessment, Program Review and Student Achievement.** The College reports excellent retention and completion rates: a high acceptance rate (98.6%) is matched by high retention in both the program and in the profession (94%). The College attributes these results to recruitment of adults who are already committed to a career in education, and careful advising and support throughout the program. The Commission commends these results and would suggest that equal attention be paid to ensuring high-quality educational outcomes that reflect master’s-level standards.

When the CPR team visited, capacity for assessment and program review was developing rapidly, thanks to a capable institutional research director hired in July 2010. At the time of the EER, the team expects to find course and program outcomes broadly promulgated in syllabi, in the College’s catalog, and on its website. It further expects to find mapping of course-, program-, and College-level outcomes; collection and analysis of evidence of learning, particularly direct evidence; and documented attainment of program-level outcomes at a master’s standard, benchmarked to peer institutions or aspirational peers. Given the growing prominence of standards-based definitions of quality of student learning in K-12 education, it will be essential for TCSJ to demonstrate how it is training its master’s students to teach and assess in a standards-based educational environment. Finally, it will be important for the College to demonstrate that it is implementing program review in a manner appropriate to the size and scope of the College. In short, the Commission expects to see significant progress in the area of assessment and program review at the time of the EER visit. (CFRs 2.2-2.4, 2.6, 2.7, 2.10, 4.4-4.7)

The four areas outlined above represent a significant set of challenges, any one of which could prove overwhelming. Achieving initial accreditation means that the College has met the WASC Standards of Accreditation not merely at a minimal level – the level expected for candidacy – but at a substantial level. As set forth below, the Commission has authorized the EER team to consider TCSJ for initial accreditation. However, the College should understand that the team is fully at liberty, if the evidence so suggests, to recommend candidacy rather than initial accreditation. At the same time, the Commission recognizes that Teachers College of San Joaquin is a uniquely agile, focused, and committed institution with a track record of making swift progress at a high level of quality. While there is much work to be done, the Commission believes that the College may be able to make sufficient progress by fall 2011 to host an EER visit for initial accreditation.

Thus the Commission acted to:

1. Receive the report of the Capacity and Preparatory Review team.
2. Proceed to the Educational Effectiveness Review, after which the Commission will consider TCSJ for initial accreditation or candidacy, as appropriate.
3. Schedule the EER for fall 2011. The EER report will be due 12 weeks prior to the scheduled visit.

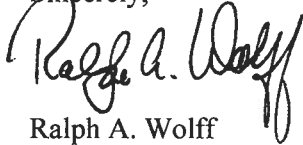
In accordance with Commission policy, a copy of this letter will be sent to the chairs of the SJCOE Board and the advisory board in one week. The Commission expects that the team report and this action letter will be widely disseminated throughout the institution to promote further engagement and improvement, and to support the College’s response to the specific issues identified in them.

Because of the complexity and importance of the board governance issues raised in this letter, we invite you and other members of the TCSJ leadership team to meet with your assigned liaison, Vice President Barbara Wright, and Executive Vice President Teri Cannon, here in the WASC office as soon as possible

to discuss this issue and confer about the options for fulfilling this important WASC requirement. Please contact Philip Cole Regis in our office to schedule this meeting.

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

RAW/bw/aa

cc: Linda Johnsrud, Commission Chair  
Catherine Kearney, Dean and ALO  
Jill Fritchen, SJCOE Board President  
Dr. Rick Wentworth, TCSJ Advisory Board Chair  
Members of the CPR team  
Barbara Wright