



UNITED STATES DEPARTMENT OF EDUCATION

THE UNDER SECRETARY

March 16, 2026

*Transmitted via electronic mail*

Maria Toyoda, Ph.D.  
President  
Western Association of Schools and Colleges  
Senior College and University Commission  
1080 Marina Village Parkway, Suite 500  
Alameda, California 94501

Dear Dr. Toyoda:

I write to inform you, in my capacity as the senior Department official (SDO), of my decision regarding the renewal of recognition of the Western Association of Schools and Colleges Senior College and University Commission (WSCUC). In reaching this decision, I have considered recommendations from U.S. Department of Education (Department) staff and the National Advisory Committee on Institutional Quality and Integrity (NACIQI). These recommendations were made pursuant to sections 114 and 496 of the Higher Education Act of 1965, as amended, and 34 C.F.R. Part 602.

WSCUC was reviewed for continued recognition in Spring 2023. At that time, the then-SDO determined that the agency was not in compliance with 13 regulatory criteria: 34 C.F.R. §§ 602.15(a)(2); 602.15(b); 602.16(a)(1)(iv); 602.16(a)(i)(vii); 602.17(h); 602.22(a)(2)(i)-(ii); 602.22(f)(1); 602.23(c); 602.25(a)-(e); 602.25(f); 602.28(b); 602.28(c); and 602.28(d). The SDO's determination was aligned with the recommendations of Department staff and NACIQI.

In a letter dated July 18, 2023, the SDO continued WSCUC's recognition contingent upon the agency demonstrating compliance with the cited criteria within 12 months and on the condition that WSCUC submits a compliance report.<sup>1</sup> WSCUC subsequently submitted its compliance report, which included documentation and information demonstrating compliance, as summarized below.

- **34 C.F.R. § 602.15(a)(2):** WSCUC has established a revised peer review policy to ensure that site visitors receive appropriate training regarding their responsibilities related to the agency's standards, policies, and procedures. The agency also provided documentation demonstrating that site visitors receive such training in accordance with this written policy. Accordingly, the agency is now in compliance with this criterion. Notwithstanding this determination, it is important to note the considerable period of time required for the agency to achieve compliance, despite the extensive analysis and guidance provided in the two most recent Staff Reports. The agency is therefore strongly

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<sup>1</sup> The previous decision letter was initially dated May 31, 2023, but it was subsequently corrected and reissued on July 18, 2023, to address an error.

encouraged to exercise heightened diligence in ensuring that any individual on whom it relies to conduct on-site evaluations, apply or interpret its policies, or participate in accrediting or preaccrediting decisions is fully and appropriately trained *before* undertaking those responsibilities. The agency bears a legal and ethical responsibility to ensure that all participants are adequately trained, given the potential impact on the integrity of accreditation decisions. The agency should continue to closely monitor its implementation of these requirements to ensure sustained compliance and ongoing improvement in this area.

- **34 C.F.R. § 602.15(b)**: WSCUC has revised its records retention policy to clarify that institutions are afforded the opportunity to respond to on-site reports. The revised policy further specifies that such institutional responses will be maintained by the agency, will form part of the official record, and will be considered by the Commission as part of its decision-making process. The agency also provided documentation demonstrating that it has operationalized the revised policy, including sample communications inviting institutional responses and examples of institutional submissions.
- **34 C.F.R. § 602.16(a)(1)(iv)**: WSCUC has demonstrated that it revised its standards to establish clear expectations for the institutions it accredits with respect to facilities, equipment, and supplies. In addition, the agency updated its self-study and site visit report templates to incorporate explicit review of this area during the evaluation process. The agency further provided sufficient documentation demonstrating that it has operationalized these revisions in practice, including multiple site visit reports reflecting application of the updated standards.
- **34 C.F.R. § 602.16(a)(1)(vii)<sup>2</sup>**: WSCUC provided documentation demonstrating that it has sufficiently applied its standards related to recruiting and admissions practices to the University of Arizona Global Campus. This documentation included a detailed narrative describing the agency's history of close and regular review and monitoring of the institution in this area. In addition, the agency submitted a recent site visit report from Spring 2025 reflecting its continued evaluation of the institution's recruiting and admissions practices.
- **34 C.F.R. § 602.17(h)**: WSCUC provided evidence demonstrating that it has implemented updated site review forms reflecting that the agency assesses whether institutions maintain processes that protect student privacy and provide notice to students of any projected additional charges associated with the verification of student identity at the time of registration or enrollment. The agency submitted multiple sample reviews of distance education programs and courses reflecting evaluation of these requirements, thereby demonstrating the agency's consistent operationalization of the policy.
- **34 C.F.R. § 602.22(a)(2)(i)-(ii)**: WSCUC provided a policy that appropriately limits staff review of substantive change requests to the activities expressly permitted under this

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<sup>2</sup> The previous decision letter, dated May 31, 2023, incorrectly cited the applicable criterion as 34 C.F.R. § 602.16(a)(i)(vii) rather than 34 C.F.R. § 602.16(a)(1)(vii).

criterion. The agency also submitted multiple examples of substantive change reviews demonstrating the application of this policy in practice. Accordingly, the agency is now in compliance with this criterion. Notwithstanding this determination, it is important to note the considerable length of time required for the agency to achieve compliance, despite the extensive analysis and guidance provided in the two most recent Staff Reports. The agency is therefore strongly encouraged to exercise heightened diligence in ensuring that staff approval authority remains strictly limited to the specific categories of substantive changes permitted under this regulation. Substantive changes, by their nature, often involve high-impact and high-risk developments and therefore warrant oversight that extends beyond staff-level review, where required by regulation.

- **34 C.F.R. § 602.22(f)(1):** WSCUC has adopted a policy requiring a visit to an additional location in each of the three circumstances specified in the criterion. The institution was unable to provide documentation demonstrating implementation of its revised policy with respect to § 602.22(f)(1)(ii)-(iii), as no site visits have yet occurred under those provisions. However, the institution did provide evidence demonstrating compliance with § 602.22(f)(1)(i). The absence of implementation evidence with respect to the second two romanettes, in this context, does not constitute a finding of noncompliance. Nevertheless, the agency remains obligated under § 602.18 to consistently apply and enforce its policy.
- **34 C.F.R. § 602.23(c):** WSCUC has implemented a revised complaints policy that satisfies the requirements of the criterion and has provided five file reviews demonstrating compliance with that policy. Notwithstanding the agency's current compliance with this criterion, Department staff reported in the most recent Staff Report an additional complaint concerning the timeliness of the agency's review of complaints and its related follow-up actions, as appropriate. The agency is encouraged to ensure that it implements the revised complaints policy with fidelity, including by reviewing complaints and undertaking any necessary follow-up actions in a timely manner, as required by 34 C.F.R. § 602.23(c)(3).
- **34 C.F.R. § 602.25(a)-(e):** As noted in the summary for 34 C.F.R. § 602.15(b) above, WSCUC has revised its records retention policy, which brings the agency into compliance with this due process criterion. The revised policy provides institutions with an opportunity to respond to any deficiencies identified by the agency and requires the maintenance of complete and accurate records for the periods mandated by 34 C.F.R. § 602.15(b).
- **34 C.F.R. § 602.25(f):** WSCUC has revised its appeals policy to eliminate the previously imposed, impermissible limitations on an institution's ability to appeal any adverse action. These limitations have been removed in the revised policy, and the agency provided documentation demonstrating compliance with this criterion.
- **34 C.F.R. § 602.28(b):** WSCUC has provided documentation demonstrating the application of its policy permitting the renewal of accreditation notwithstanding an

institution's being subject to an action under 34 C.F.R. § 602.28(b)(1)-(4), provided that the agency timely notifies the Secretary in accordance with 34 C.F.R. § 602.28(c).

- **34 C.F.R. § 602.28(c):** WSCUC has provided the explanation required by the criterion with respect to Thomas Jefferson School of Law, which should have been submitted to the Secretary within 30 days of the agency's action but was not. Additionally, the agency submitted a second example involving the grant of renewed accreditation to an institution placed on probation by another accreditor. Unlike the former instance, the agency submitted its explanation to the Secretary in a timely manner, thereby demonstrating compliance with the criterion.
- **34 C.F.R. § 602.28(d):** WSCUC has provided the required information, including evidence of a multi-part virtual review and an in-person site visit, in the instance of an institution being placed on probation by another recognized accreditor. This documentation is sufficient to demonstrate that the agency is in compliance with the criterion.

Following their respective reviews of WSCUC's compliance report, both Department staff and NACIQI recommended that I approve the compliance report and grant the agency's request for renewal of recognition.

For the reasons set forth in the final Staff Report, the transcripts of the NACIQI meeting, and the full administrative record before me, I concur with the recommendations of Department staff and NACIQI. Accordingly, I approve WSCUC's application for continued recognition until May 31, 2028.<sup>3</sup>

**Scope of Recognition:** The accreditation and preaccreditation ("Candidate for Accreditation") of institutions of higher education that offer the baccalaureate degree or above, including distance education programs offered at those institutions. Geographic Area of Accrediting Activities: Throughout the United States.

**Recognition Period:** Through May 31, 2028, which represents five years from the date of the previous SDO decision letter issued on May 31, 2023.<sup>4</sup>

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<sup>3</sup> The previous decision letter was initially dated May 31, 2023, but it was subsequently corrected and reissued on July 18, 2023, to address an error. As stated in the corrected letter (page 2), "[t]imelines for compliance and monitoring reports should be calculated from the date of the initial decision." Similarly, the five-year recognition period runs from the date of the initial SDO decision, May 31, 2023.

<sup>4</sup> The recognition period is limited to a maximum of five years, including any time during which recognition was extended for the submission and review of a compliance report. *See* § 602.36(e)(1)(ii).

Sincerely,



Nicholas Kent  
Under Secretary

cc: Tracy Poon Tambascia, Ed.D.  
Commission Chair, WSCUC

Christopher Oberg, Ph.D.  
Executive Vice President, WSCUC