My name is Leila Hudson. I serve as Elected Chair of the Faculty at the University of Arizona, a role charged with statutory responsibility under Arizona Revised Statute 15-1601b to actively participate in policy making on behalf of the nearly five thousand general and emeritus faculty at my institution. I thank NACIQI and its staff for the opportunity to speak with you. Thank you for the work you do. Tens of millions of students depend on it.

My concerns and questions about WASC/WSCUC include concerns about two institutions and the relationship between them.

The first institution is UAGC, the former Ashford University. WASC/WSCUC’s ongoing notice of concern on Ashford/UAGC since the University of Arizona’s acquisition seems to be ineffective in changing notorious practices that hurt students.

I draw your attention to the astonishing rise in graduation rates at UAGC and the charging of graduation fees to 15,000 students (out of a total population of 24-28 thousand enrolled students) in this calendar year alone. If there is a compelling explanation for this near miraculous improvement in graduation rates, I have not found it. My concern is exacerbated by UAGC charging a so-called graduation fee of $150 per student for Associates, Bachelors, and MA and $500 for doctoral students. I do not believe that this is a legitimate practice and it continues in plain sight. Where is WASC/WSCUC - what is it doing to monitor not only the familiar bad news from UAGC, but this improbably good news?

The second Institution is my university, the University of Arizona proper. As you may know, the University of Arizona is currently in the end stages of switching its accreditor from HLC which accredited us for 117 years to WASC/WSCUC. The process was rushed, unfolding quietly between November 15, 2022 and the present. When WASC came to review us in January 2023 they declined to meet with me as Chair of the Faculty except in a short group meeting with student leaders. Not surprisingly the visitors could not answer my questions about the relationship of University of Arizona’s accreditation switch to UAGC’s Notice of Concern. My early January letter to the head of WASC/WSCUC has not been answered.

I am concerned that WASC/WSCUC may be accommodating, if not coordinating, a complex and secretive inter-institutional integration project between two of its institutions which may sidestep Arizona law. Has WASC’s focus on equity, evidence and global reach created an exploitable blind spot on governance compliance issues?

I worry - and no one has tried to reassure me otherwise - that WASC/WSCUC may be overseeing a process by which - on June 30th or July 1, 2023 UAGC’s long standing notice of
concern will disappear under the shield of the historic reputation for excellence of the University of Arizona, as the legal statuses and finances of the two very different institutions become one, while the legally mandated oversight from the University of Arizona faculty will be blocked by means of something as simple as separate IPEDS numbers. I do not have the benefit of having seen the substantive change application submitted by the University of Arizona to WASC by today’s deadline since it has not been shared with an elected governance body at the University of Arizona.

Thank you for hearing my concerns today. Please read my letter submitted to the NACIQI staff. If an accreditor is not an active part of the solution to an institution’s failures, then it may well be part of the problem.