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**PRESIDENT**  
Mary Ellen Petrisko

March 4, 2015

Gregory O'Brien, PhD  
President  
International Technological University  
W 355 San Fernando  
San Jose, CA, 95113

Dear President O'Brien:

At its meeting February 18-20, 2015, the Commission considered two team reports, the first from the Special Visit team that conducted an onsite review of International Technological University (ITU) on October 14 – 17, 2014; the second report was submitted by the special investigation team based on its visit of February 6, 2015. Commission members also reviewed the Special Visit report submitted by ITU prior to the October 2014 visit. The Commission appreciated the opportunity to discuss the visits with your colleagues Sophia Gu, Associate Director of Academic Services and ALO; Angie Lo, Associate Director of Strategic Planning; and Board members Alvin Chung and Thomas Gold. Their comments were helpful in informing the Commission's deliberations.

At the time of the 2012 special visit, following which the Commission granted Initial Accreditation, ITU was required to prepare for a 2014 special visit to review continuing progress in the following four areas: Faculty Adequacy, Assessment Infrastructure, Institutional Research, and Strategic Planning. With regard to each of these areas, the team report commends the institution for the following:

1. The approved Faculty Adequacy Model has guided the addition of both part- and full-time faculty in appropriate numbers and has established a metric to determine additional hires as enrollments grow.
2. ITU has hired qualified institutional researchers and has enhanced the data system to provide indicators for key institutional metrics, which are being used to support decision-making processes.
3. Strategic planning has been moved to a two-year cycle with broad participation, is more closely linked to institutional goals, and is supported by data from the learning management system.
4. Supported by consultants, and with broad faculty engagement, the assessment infrastructure is more closely linked to the learning management system and is focused more on learning outcomes at the program level.

A few months following the October visit, however, the WSCUC office received a number of well-documented and detailed Third Party Comments alleging executive-level behaviors that, if verified, would represent serious non-compliance with WSCUC Standards and potentially with Federal regulations. An investigative team was sent to the institution on February 6, 2015, to inquire into the veracity of the allegations. At the conclusion of that visit, the team reported to the assembled members of the ITU Board that the allegations were sufficiently corroborated to indicate the necessity for decisive action. Within hours, the Board removed the then sitting President and invited you to accept the presidential role – which you did.

While the Commission commends the timeliness of this action, the Third Party Comments also brought to the surface a number of operational values and behaviors that appear to have become the norm under the previous administration. In order to provide for due process procedures related to the February 2015 investigative report, the Commission is acting to defer action on the report from the October 2014 visit until the June 2015 Commission meeting. During this period of time, however, ITU is expected to expend diligent and productive efforts to address these issues. While the team report provides critical detail and context, the following summary of expected actions must guide the institution's efforts in the brief time leading up to the June 2015 Commission meeting:

**Governance:** ITU must demonstrate increased Board engagement in the following areas: working with executive leadership in setting, supporting, and evaluating key initiatives; ensuring that these initiatives and expenditures are in alignment with the institution's core educational mission; conducting systematic evaluations of the CEO against established criteria; activating key Board committees, including finance, membership, and education; expanding the size of the Board to include significant representation of higher education experience; and conducting systematic Board self-evaluation and development. (CFRs 1.7, 1.8, 3.7, 3.8)

**Quality and Integrity:** ITU must establish internal processes to ensure that all relevant procedures are conducted in strict compliance with expectations around integrity of records, processes, and reporting requirements. These will include quality controls over key operations related to admissions, student records, transcripts, and the implementation of academic policies; financial controls and reporting; federal and state government requirements with reference to immigration, visas, Student and Exchange Visitor Information System (SEVIS), and Curricular Practical Training (CPT); adhering to established human resource protocols and best practices in personnel management, including relations with external contractors; and setting controls against internal conflicts of interest and the appearance of private inurement through University resources. (CFRs 1.7, 3.6, 4.1)

**Executive and Managerial Leadership:** ITU must expend efforts to recruit, support, and retain qualified leadership at the executive and senior management levels, including: establishing clear position descriptions and lines of authority; providing training and professional development appropriate to leaders' roles and responsibilities; and aligning



the allocation of resources – human, financial, and technological – with the established educational priorities of the University. (CFRs 3.1, 3.2, 3.3)

It must be made clear to the institution and to the governing Board that the concerns expressed herein are not inconsequential. The range of actions available to the Commission at its June session could include a serious sanction should earnest good faith efforts not be made to instill a culture of integrity throughout the institution.

In view of the above, the Commission acted to:

1. Receive the team report of the findings of the October 2014 Special Visit and defer any action arising from that visit.
2. Based on the findings of the October 2014 Special Visit team report, and of the February 6, 2015, investigative team report, require the institution to respond to the issues identified in this letter related to Board governance, internal quality controls, and the development of senior management.
3. Schedule a Special Visit prior to the June 2015 Commission meeting to evaluate the institutional response to the issues identified by the investigation. Append the findings of that visit with the reports from the October 2014 and February 2015 visits as the basis for action in June 2015.

In accordance with Commission policy, a copy of this letter will be sent to the chair of ITU's governing 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 institution's response to the specific issues identified in this letter.

Finally, the Commission wishes to express its appreciation for the extensive work that International Technological University undertook in preparing for and supporting both the Special Visit review and the investigation review. WSCUC is committed to an accreditation process that adds value to institutions while contributing to public accountability, and we thank you for your continued participation in this process. Please contact me if you have any questions about this letter or the action of the Commission.

Sincerely,



Mary Ellen Petrisko  
President

MEP/rw

Cc: William Ladusaw, Commission Chair  
Sophia Gu, ALO  
Chi Hsieh, Board Chair  
Richard Winn, Senior Vice President and staff liaison