

February 27, 2026

Dr. Daniella Baker
Chancellor
Pathways College
2226 N. 7th Street, Suite 220
Phoenix, AZ 85006

Dear Chancellor Baker:

This letter serves as formal notification and official record of action taken concerning Pathways College (PathC) by the WASC Senior College and University Commission (WSCUC) at its meeting on February 13, 2026. At that meeting, the Commission acted to place PathC on Show Cause. This action was taken after consideration of the report of the review team that conducted the Special Visit to PathC on August 28-29, 2025. The Commission also reviewed the institutional report and exhibits submitted by PathC prior to the Special Visit, the supplemental materials requested by the team after the Special Visit, and the institution's November 17, 2025 response to the team report. The Commission appreciated the opportunity to discuss the visit with you and your colleague Randall Hoggard. Your comments were very helpful in informing the Commission's deliberations. The date of this action constitutes the effective date of the institution's status with WSCUC.

Actions

1. Receive the Special Visit team report focused on: (1) enrollment; (2) the status of the college's application for Title IV recognition; and (3) progress on obtaining commitment from donors for scholarships
2. Issue an Order to Show Cause
3. Schedule a Special Visit in fall 2026 to address:
 - a. Standard 1: institutional integrity and transparency.
 - b. Standard 3: financial stability, long-term viability, leadership and governance.
 - c. Standard 4: strategic planning, systematic program review, and learning outcomes assessment.

Show Cause

The Commission acted to impose the sanction of Show Cause which is a decision by the Commission to terminate the accreditation of the institution within a maximum period of one year from the date of the Order unless the institution can demonstrate why such action should not be taken. The Commission issues an order to Show Cause when it finds

an institution in substantial noncompliance with one or more Commission Standards. The Commission has found PathC to be out of compliance with WSCUC Standards 1, 3, and 4. The accreditation status of the institution continues while under Show Cause. However, any new sites or degree programs initiated by the institution must be approved through the substantive change process.

When the Commission finds that an institution fails to meet one or more of the Standards of Accreditation, it is required to notify the institution of the deficiencies and may take immediate adverse action or establish a time period within which the deficiencies must be corrected. Under the Commission's policies the timeframe may not exceed one year. If an institution has not remedied the deficiencies at the conclusion of this sanction period, or sooner if the Commission determines such action is warranted, the Commission will withdraw the institution's accreditation or extend the timeframe for good cause shown. The initial extension may not exceed two years.

An institution under the sanction of Show Cause must address the areas cited by the Commission expeditiously, with seriousness and the full attention of the institution's leadership. It is the responsibility of the institution to demonstrate to the Commission that it has understood the issues raised in this letter, responded to them satisfactorily, and has made the necessary changes to come into compliance with Standards 1, 3, and 4. It is the responsibility of the Commission to determine whether the institution has made the necessary corrections and has come into compliance with Standards 1, 3, and 4.

Non-Compliance with Standards: Deficiencies to be Addressed

1. Standard 1: CFR 1.1, 1.2 It is not clear how PathC sets goals and standards to ensure student outcomes and support for student success for all of its students. The dramatic shift toward dual enrollment represents a fundamental change in institutional focus from the original mission of serving non-traditional adult learners to primarily serving high school students. The institution has not made clear how/whether it has thought through mission alignment through its planning processes. PathC needs to clearly define the goals of its academic program as well as develop practices to support student success with systematic evaluation of those support programs to ensure success for students with very different learning needs. CFR 1.3, 1.7, 1.8 The institution does not operate with full transparency in communications. The college lacks formal protocols for communicating with external regulatory entities, including the U.S. Department of Education, WSCUC, state agencies, and other accrediting bodies, resulting in incomplete and inconsistent regulatory communications. For example, the communications with the Department of Education continue to be informal. The Bureau of Private Postsecondary Education still lists Pathways College as located in Pasadena, California even though the college has moved to Arizona. In addition, the institution's current accreditation status, including notices and sanctions should be clearly articulated on their accreditation home page, rather than provided as a reference link. It is important for PathC to provide consistent and open

communication with its constituents, state, and federal agencies, and accrediting bodies including WSCUC.

2. Standard 3: CFR 3.4, 3.5 The financial position of PathC remains precarious. The institution has not implemented a realistic budgeting model and has not shown sufficient resources to ensure long-term fiscal sustainability. The institution's Integrated Strategic Marketing Plan for 2025-2028 relies heavily on Title IV funding which has not been successfully attained after two years. Resource planning should include diverse revenue streams and a clear path to long-term financial sustainability. CFR 3.7 PathC's Board does not operate with appropriate autonomy and integrity. The institution's funding dependency on Hawkeye Properties and Workforce Innovation, Inc., totaling \$1.24 million, creates the potential for undue influence because the relationship between Hawkeye Properties and Workforce Innovation, Inc., and John Hall, stated President of Pathways Management and of Higher Education Management, is not clearly delineated.
3. Standard 4: CFRs 4.2, 4.3 The institution does not sufficiently track and analyze student outcomes, such as retention and graduation, to examine the success of all of its students. PathC should begin to regularly assesses the characteristics, experiences, and performance of its students to improve student success. Beyond reviewing enrollment data, the college does not perform systematic analysis of student retention data and other student success outcomes. There is also a need to assess the effectiveness of support structures put in place to address the increase in high school dual enrollment students in a shared learning environment with adult students.

The Commission requires the institution to respond to the following issues:

1. **Financial Stability and Long-term Viability** (CFRs 3.4, 3.5, 3.8, 3.9, 3.11)
 - a. Develop realistic, multi-year budget models based on scenarios with revenue streams beyond single source donor funding, Title IV federal financial aid, or in-kind services.
 - b. Ensure that multi-year budget models integrate planning for strategic enrollment management as well as academic and student support services.
 - c. Assess the current staffing structure and develop future staffing plans with a focus on appropriate internal controls, separation of duties, and expertise needed in each position or role.
 - d. Identify and address the issue(s) causing delays in obtaining federal Title IV approval.
2. **Strategic Planning** (CFRs 1.1, 3.4, 4.8)
 - a. Conduct a comprehensive analysis of mission focus, including clear definitions of target student populations and alignment between stated mission and current enrollment practices.

- b. Address the transition from serving non-traditional adult learners to predominantly dual enrollment students, including the assessment of pedagogical implications and student support requirements.
- c. Develop systematic strategic planning processes that move the institution from reactive crisis management to proactive institutional development.
- d. Establish clear institutional priorities that align mission, enrollment strategies, and resource allocation.
- e. Implement comprehensive assessment frameworks to evaluate the effectiveness of the mission and the achievement of strategic goals.

3. Program Review and Assessment (CFRs 2.4, 4.1, 4.2, 4.4, 4.5, 4.6)

- a. Implement and complete faculty-driven academic program reviews for all academic programs on a regular assessment cycle, including an analysis of student achievement of program learning outcomes.
- b. Establish robust data collection systems and create analysis systems for tracking student learning outcomes in academic and non-academic areas to improve institutional operations.
- c. Track and monitor retention and graduation rates for all programs and student populations.

4. Institutional Transparency (CFRs 1.7, 1.8).

- a. Develop institutional protocols for timely and accurate public disclosure of regulatory communications and accreditation materials.
- b. Enhance the transparency of governance structures to ensure that institutional reports provide comprehensive information about donor relationships, board composition, and decision-making processes.
- c. Establish transparent communication practices, including the disclosure of accreditation status on the website, Commission actions, and governance information as required by WSCUC policy.

Maximum Timeframe

The deficiencies identified in this letter must be corrected within the maximum timeframe which extends until February 27, 2027, unless extended by the Commission for good cause.

Next Steps

The Commission requires a meeting between the WSCUC staff and representatives of PathC, including the Chief Executive Officer, representatives of the governing board, and senior faculty leadership within 90 days from the date of this letter. The purposes of the meeting are to further clarify the reasons for the Commission's bases for decision, to review the actions taken as of the date of the meeting, and to discuss the institution's plans for responding to this Commission action. WSCUC will contact PathC's ALO to make arrangements for this meeting.

Commission policy requires that in the case of a sanction, a public statement will be prepared in consultation with the institution acknowledging the institution's status. The Commission reserves the right to make the final determination of the nature and content of the public statement. The institution must post the statement within seven business days, along with a copy of the Commission letter, in a readily accessible location on the institution's website and accompanying every reference to WSCUC accreditation. The institution must also provide evidence to WSCUC that the public statement has been posted.

Enclosed is a copy of a sample public statement, which PathC may use as it stands. If you wish to propose revisions to the sample, your proposed changes must be forwarded by email to Vice President Hawley within 24 hours of receipt of this letter. In addition, any reference to WSCUC accreditation on the website and in public statements must be accompanied by the words "Currently on Show Cause."

Submit a Teach-Out Plan

An institution under the sanction of Show Cause by the Commission must submit to WSCUC a teach-out plan that would be implemented if the institution were to close. A teach-out plan identifies opportunities for the students of a closing institution to complete their program at other institutions offering the same or similar degree programs, certificates, or curricula leading to professional licensure, regardless of students' academic progress at the time of closure. The WSCUC Teach-Out Plans and Agreements Policy and associated Guide provide information on what to include in a teach-out plan.¹

In accordance with Commission policy, a copy of this letter is being sent to the chair of PathC's governing board. The Commission expects that the team report and this action letter will be posted in a readily accessible location on PathC's website and widely distributed throughout the institution to promote further engagement and improvement and to support the institution's response to the specific issues identified in these documents. The team report and the Commission's action letter will also be posted on the WSCUC website within one business day of the date of this letter. If the institution wishes to respond to the Commission action on its own website, WSCUC will post a link to that response on the WSCUC website. The Secretary of Education, appropriate State licensing or authorizing agencies and the appropriate accrediting agencies are copied on this letter.

Please contact me if you have any questions about this letter or the action of the Commission.

¹ 34 Code of Federal Regulations § 668.43(a) (19) states: "Information that the institution must make readily available to enrolled and prospective students under this subpart includes. . . [i]f the institution is required to maintain a teach-out plan by its accrediting agency, notice that the institution is required to maintain such teach-out plan and the reason that the accrediting agency required such plan under § 602.24(c)(1). . ."

Sincerely,

A handwritten signature in black ink, appearing to read 'A. Maria Toyoda', with a long, sweeping horizontal stroke extending to the right.

A. Maria Toyoda
President

AMT/thh

Cc: Tracy Poon Tambascia, Commission Chair
Randall Hoggard, ALO
Norbert Kreuzer, Board Chair
Members of the Accreditation Visit Team
Tamela Hawley, Vice President

SAMPLE PUBLIC STATEMENT

WASC Senior College and University Commission Statement on the Status of Pathways College

On February 13, 2026, the WASC Senior College and University Commission (WSCUC) voted to issue an Order to Show Cause on Pathways College (PathC).

A sanction of Show Cause reflects the Commission's finding that the institution has serious issues of noncompliance with one or more of the Standards of Accreditation. The Commission has determined that PatchC is not in compliance with WSCUC Standard(s) 1, 3, and 4. Under U.S. Department of Education Regulations, when the Commission finds that an institution fails to meet one or more of the Standards of Accreditation, it is required to notify the institution of these findings and give the institution a period of time to correct the deficiencies. Under the Commission's policies the timeframe may not exceed two years. It is the responsibility of the Commission to determine, at the end of the sanction period, whether the institution has made the necessary corrections and has come into compliance with Commission Standards.

The accredited status of PathC continues during the Show Cause period and students' status within the institution is not affected by this sanction.

The Commission's decision to issue PathC a sanction of Show Cause is subject to the terms and conditions contained in the Commission Action Letter dated **February 27, 2026**. This document is available on the WSCUC website. Anyone who has questions about PathC's accreditation status should contact Randall Hoggard, Accreditation Liaison Officer at PathC.