REPORT OF THE WSCUC TEAM
SPECIAL VISIT
To Pathways College

August 28-29, 2025

Team Roster

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The team evaluated the institution under the **2023** Handbook and Standards of Accreditation and prepared this report containing its collective evaluation for consideration and action by the institution and by the WASC Senior College and University Commission (WSCUC).

The formal action concerning the institution's status is taken by the Commission and is described in a letter from the Commission to the institution. This report and the Commission letter are made available to the public by publication on the WSCUC website.

SECTION I – OVERVIEW AND CONTEXT

A. Description of Institution, Accreditation History, as relevant, and Visit

Pathways College is a private, nonprofit institution located at 64 E. Broadway Rd., Suite 200, Tempe, Arizona 85282. Founded in 2015 with the mission to provide pathways for non-traditional students to realize their dreams of obtaining a college education, the institution emphasizes "Affordable and Accessible" education to break the cycle of economic dependency. The college received approval to operate from the California Bureau of Private Postsecondary Education (BPPE) in November 2016 and began its first cohort of students in January 2017. The institution offers bachelor's degree programs, including BA in Business Administration, BA in Liberal Studies, and a newly approved AS in Computer Information Systems (CIS). Current enrollment stands at 29 full-time degree-seeking students, and the program has served 421 part-time dual enrollment students as of June 2025, representing significant growth from previous years. The college is led by Chancellor Dr. Ella Baker, with governance oversight provided by a nine-member Board of Directors.

Accreditation History

Pathways College was granted Initial Accreditation by WSCUC as of June 1, 2021, for a term of six years. The institution has been operating under ongoing Commission oversight due to concerns regarding financial sustainability and enrollment viability. Previous reports submitted in October 2024 and April 2025 addressed Commission concerns about low enrollment numbers and financial stability. The Commission issued a Notice of Concern on May 20, 2025, citing continued issues with enrollment sustainability, Title IV application delays, and reliance on donor funding.

This Special Visit was scheduled to address persistent concerns about the institution's financial viability and sustainability, specifically:

- Low full-time enrollment numbers and financial sustainability challenges
- Delays in securing Title IV federal financial aid eligibility

- Heavy reliance on donor funding from Hawkeye Properties and Workforce Innovation, Inc.
- Questions about long-term operational sustainability

The Special Visit report addresses the following key areas:

1. Current financial status and sustainability projections
2. Enrollment growth and retention data
3. Progress on Title IV application process
4. Governance structure and board oversight
5. Faculty qualifications and academic program quality
6. Student learning outcomes assessment
7. Strategic planning for future growth and sustainability

Pathways College operates primarily as a virtual institution with faculty and staff distributed across the United States. The team chair visited the Tempe, Arizona, location and found that the institution is housed in a corporate work-share space, which allows for a flexible and expandable arrangement as needed for small group instruction, testing, and tutoring, but does not provide an air of permanence for the institution. This is clearly a "rent-an-office" location. The institution offers dual enrollment programs in partnership with multiple high schools, including Options for Youth, Opportunities for Learning schools, and Southwest Leadership Academy. These partnerships were reviewed as part of the visit, though no separate off-campus locations or formal distance education programs required independent evaluation.

B. Description of Team's Review Process

The visiting team conducted a comprehensive review process that began with a preliminary analysis of institutional materials and culminated in a virtual on-site visit on August 28-29, 2025. Prior to the visit, team members thoroughly reviewed all materials provided by Pathways College, including the institutional report and supporting documentation. The team convened via video conference on July 22, 2025, to collectively analyze the materials, identify key areas of inquiry, and develop strategies for the visit.

Following the initial review, Pathways College provided an addendum containing additional requested documentation, which the team also examined prior to the visit. This addendum included current audited financial statements, detailed enrollment and retention data, governance documentation, student learning outcomes assessments, faculty qualifications, correspondence with the U.S. Department of Education (ED), organizational charts, board committee structures, strategic plans, and agreements with external partners. As mentioned previously, on August 14, 2025, the team chair traveled to Tempe to meet with the provost and visit the primary location identified for the college.

During the virtual on-site visit, the team conducted structured interviews with key institutional stakeholders, including the Chancellor, Chief Financial Officer, and members of the Board of Directors. The team employed multiple verification methods to assess the accuracy of reported data and claims, including document analysis, stakeholder interviews, and cross-referencing of information sources.

The team's approach focused on evaluating institutional capacity for sustainable operations, governance effectiveness, academic quality, and student success outcomes. Special attention was given to financial sustainability measures, enrollment management strategies, and the institution's progress in addressing previously identified concerns regarding Title IV eligibility and donor dependency.

C. Institution’s Special Report: Quality and Rigor of the Report and Supporting Evidence

The institutional report functioned primarily as a compliance document rather than demonstrating rigorous institutional self-reflection. The analysis was largely descriptive rather than evaluative, with limited evidence of deep inquiry into root causes or systematic improvement planning. Several claims lacked adequate supporting evidence, including assertions about personnel stability and governance effectiveness, while conclusions about financial sustainability were not well-aligned with the evidence of continued donor dependence and external vulnerabilities.

The report preparation involved minimal institutional engagement, as it was developed primarily by senior leadership without meaningful faculty involvement or comprehensive board review due to timeline constraints. While the institution provided factual updates on enrollment growth and financial status, it demonstrated a limited evaluation of the effectiveness of action steps beyond meeting immediate compliance requirements. The approach was largely reactive rather than proactive, lacking the kind of systematic methodology and benchmarking that would indicate genuine organizational learning and sustainable improvement planning beyond crisis response.

SECTION II – EVALUATION OF ISSUES UNDER THE STANDARDS

Issue 1: Enrollment Update

The team examined the enrollment data provided in the institutional report and addendum, including detailed spreadsheets that show enrollment history from 2017 to 2025, broken down by full-time/part-time status and degree program. Key evidence reviewed included: current enrollment of 29 full-time degree-seeking students (up from 9 in 2023-2024), 421 part-time dual enrollment students served in 2024-2025, tuition revenue of $277,557 in 2024-25, and documentation of partnerships with Options for Youth, Opportunities for Learning schools, and Southwest Leadership Academy.

Pathways College has demonstrated enrollment growth, with increases in dual enrollment (from 75 to 314 students), full-time enrollment (from 9 to 28 students), and overall enrollment (from 84 to 342 students). The institution secured $1.24 million in Hawkeye Properties funding to underwrite scholarships and dual enrollment programs, directly enabling this growth. However, the team identified several concerns regarding the sustainability and strategic coherence of these actions in relation to WSCUC Standards.

The dramatic shift toward dual enrollment, in the team’s view, represents a fundamental change in institutional focus from the original mission of serving non-traditional adult learners to primarily serving high school students, raising questions about mission alignment (CFR 1.1). While enrollment numbers are increasing, the institution has provided limited evidence of systematic planning to support this growth or analysis of the pedagogical implications and appropriate student support mechanisms for serving highly diverse student populations in the same classroom settings, which impacts educational effectiveness (CFR 2.1, 2.4, 2.13).

The institution's approach appears largely opportunistic rather than strategically planned, lacking evidence of systematic institutional assessment and planning processes (CFR 4.1, 4.9). There is insufficient evidence of diversified recruitment strategies, marketing investment, or sustainable enrollment management systems that would support ongoing institutional effectiveness (CFR 4.1, 4.2). The reported flat summer enrollment projections and lack of concrete partnerships with other colleges for transfer pathways suggest limited long-term planning beyond immediate growth targets. The institution’s 2025-2028 Strategic Plan indicates a reliance on secured Title IV funding eligibility prior to the implementation of planned financial investments in additional marketing and recruitment strategies. Emphasis on unsecured funding as a prerequisite for strategic marketing and recruitment presents risk in planning for long-term sustainability (CFR 3.4, 3.11).

While Pathways College has achieved enrollment growth, particularly with its dual enrollment program, fundamental questions remain about alignment with WSCUC Standards. The institution has successfully leveraged donor funding to create short-term financial stability; however, it has not demonstrated compliance with CFR 3.4 and 3.5 regarding sustainable financial resources, or with CFR 4.1 and 4.9 concerning systematic institutional assessment and improvement planning. The heavy reliance on a single donor source creates financial vulnerability that may compromise long-term sustainability (CFR 3.4, 3.5).

The shift from serving non-traditional adult learners to primarily high school dual enrollment students represents a significant shift in mission that has not been adequately analyzed in terms of mission integrity (CFR 1.1) or educational delivery effectiveness (CFR 2.1, 2.4). The institution’s emphasis on developing additional high school partnerships to increase its dual enrollment population further does not represent a comprehensive approach to recruiting new degree-seeking enrollments in alignment with its mission (CFR 1.1). The increase in high school dual enrollment students in a shared learning environment with adult students presents a need for assessing pedagogical and learning support approaches appropriate to the two key student personas served. This critical step is necessary to measure institutional effectiveness in supporting student achievement (CFR 4.3). The lack of systematic retention data analysis, limited evidence of student success outcomes beyond enrollment numbers, and the absence of a comprehensive enrollment management infrastructure raise concerns about institutional capacity for educational effectiveness (CFR 2.1) and ongoing assessment of curricular and cocurricular programming (CFR 4.1, 4.4, 4.6).

The team concludes that while current enrollment levels are improving moderately, the institution's heavy dependence on external factors beyond its direct control creates continued vulnerability regarding financial sustainability (CFR 3.4, 3.5) and institutional effectiveness (CFR 4.1). Pathways College must develop more sophisticated enrollment planning aligned with its mission (CFR 1.1), build institutional capacity commensurate with its growth ambitions (CFR 3.1, 3.2), and establish systematic assessment processes (CFR 4.1, 4.9) to achieve genuine compliance with WSCUC Standards and long-term institutional health.

Issue 2: Status of Pathway's application for Title IV recognition

The Commission's letter of August 29, 2024, which required a special visit in fall 2025, requested that Pathways College submit a progress report by October 31, 2024, addressing five specific areas. Among these were enrollment and financial projections, as well as the status of the institution's Title IV application. In issuing its Notice of Concern, the Commission noted that Pathways College was in danger of non-compliance with Standard 3, specifically CFR 3.4, as the institution continued to struggle to achieve a sustainable financial model with predictable funding sources consistent with its mission and enrollment growth plans (CFR 1.4, 3.5, 3.11).

Due to the concerns regarding sufficient enrollment revenue, diversified giving sources, and the persistent delays with the US Department of Education, The Commission required Pathways College to resolve issues inhibiting enrollment and financial stability through either Title IV qualification or systematization of institutional financial aid programs assisting students in securing non-federal aid sources to support debt-minimal education delivery in accordance with institutional mission and financial stability plans (CFR 3.5).

Pathways College initially applied for Title IV eligibility in August 2021 under the previous Chief Academic Officer, who has since retired. The application was suspended due to related party contract issues, which appear to have been subsequently resolved. Communications with the Department of Education (ED) resumed in April 2025, when the college submitted correspondence and a FY 2024 audit report prepared by CliftonLarsonAllen LLP verifying a composite score of 2.2. Due to organizational restructuring within ED, Pathways College's application was reassigned to a new liaison, who requested that the institution reapply for Title IV federal aid following changes in the related party officer and contract terminations, as communicated via an email dated April 8, 2025.

Technical access issues have significantly impeded progress. The former Chief Academic Officer received OPEID credentials that became inaccessible as an "inauthentic token." Between April 8 and May 28, 2025, the college exchanged multiple emails with two ED representatives to resolve the issue of invalid login credentials. On July 1, 2025, the college received communication from the Office of Institutions of Higher Education Oversight and Enforcement indicating a system shutdown for new entries due to a systems merger, with promises to queue the application for system restoration. Subsequent correspondence between July 15 and August 8, 2025, from Chancellor Dr. Ella Baker resulted in escalation responses without concrete resolution. The evidence reviewed consisted exclusively of email communications, confirming the necessity for more intentional, formal engagement between Pathways College and the ED (CFR 1.8, 3.5, 3.11). As of the time of the virtual on-site visit, the challenges with ED persist for Pathways College.

Pathways College anticipates receiving Title IV approval by March 2026, which will enable Pell grant-eligible student enrollment for the 2026-27 academic year. In preparation, the institution contracted with Higher Education Management, Inc. (HEM) for financial aid administration services encompassing human resources, accounting, payroll, information technology, procurement, board relations, and compliance. This partnership remains suspended pending completion and approval of the Title IV application (CFR 3.4, 3.5, 3.9). The organizational chart indicates that the Chancellor concurrently serves as the director of student services and financial aid, presenting concerns regarding the appropriate internal controls and separation of duties standards (CFR 3.1, 3.2, 3.6, 3.9, 3.11).

The institution's Integrated Strategic Marketing Plan for 2025-2028 establishes dual objectives: recruiting students requiring minimal additional aid while securing donations for scholarship and dual enrollment underwriting (CFR 2.13). However, the plan's primary emphasis relies heavily on Title IV funding capacity with Pell grant availability for recruitment and enrollment expansion, potentially including state grant programs (CFR 3.4, 3.6). In the absence of Title IV funding, Pathways College pursues alternative financial sources, primarily through private donations from two sources that appear to be connected. The institution's funding dependency on Hawkeye Properties and Workforce Innovation, Inc., totaling $1.24 million, creates vulnerability in mission fulfillment capacity due to single-source reliance (CFR 3.4, 3.5).

During a meeting with the Chief Financial Officer (CFO) of 9Dot, a subcontractor of HEM, it was stated that the college has a maximum of three years to cover operational costs using its current revenue sources and planned expense model (CFR 3.4, 3.5). Given the challenges the college is experiencing in receiving Title IV federal financial aid approval, the visiting team recommends Pathways leadership develop multiyear budget models that are not dependent upon single funding sources and optimize realistic revenue streams (CFR 3.4). These budget models should include strategic enrollment planning, marketing, staffing, and student support functions paid at market rate rather than being delivered as in-kind services

(CFR 2.13, 3.1, 3.2). While contracting accounting and financial reporting functions may prove cost-effective, this approach limits opportunities for Pathways College leadership and governing board to benefit from strategic financial guidance beyond report preparation and review. It is also noteworthy that Pathways College is the first higher education client of the CFO, who also manages other clients from other industries in their portfolio (CFR 3.1 3.9, 3.11).

The need for a Chief Financial Officer on the Pathways College leadership team is evident when reviewing the college's income statement for the fiscal year ending June 30, 2025. The institution ended the year with a deficit of $206,562 before interest, depreciation, and unrealized gains or losses in investments (CFR 3.4, 3.5). The CFO confirmed that, compared to the original FY 2024 budget projections, revenues exceeded projections by $1 million, while expenses came in $50,000 under budget. However, when questioned about board approval for significant budget adjustments, the response indicated that such adjustments are unusual (CFR 3.4, 3.7, 3.8, 3.9, 3.10). The FY 2025 budget projects a $91,912 surplus by June 30, 2026, with total payroll representing 37% of total revenues and nonpayroll expenses at 49%. This raises concerns regarding the sustainability of market-rate salaries and the continued reliance on in-kind services, which are quantified at $232,955 for the year ending June 30, 2024 (CFR 3.1, 3.2, 3.4). The visiting team encourages the college to employ a full-time CFO with the necessary background and experience to guide the financial activities of Pathways College and ensure that the board has members with financial and audit expertise (CFR 3.1, 3.7, 3.8, 3.9, 3.10, 3.11).

The team identified a significant discrepancy in Pathways College Financial Statements for the year ending June 30, 2024, prepared by CliftonLarsonAllen, LLP, and executed January 30, 2025. Page 1 of the Independent Auditor's report identifies Pathways College as a California nonprofit public benefit corporation, while page 12 defines the college as a nonprofit entity exempt from income tax payment under Internal Revenue Code (IRS) Section 501(c)(3). According to IRS definitions, a public benefit corporation (B Corp) constitutes a for-profit entity under state law, while 501(c)(3) organizations maintain tax-exempt status granted by the IRS for nonprofit enterprises (CFR 1.8, 3.5). Pathways College cannot simultaneously maintain a public benefit corporation and a 501(c)(3) tax-exempt status. In meetings with the governing board and the CFO, the visiting team was unable to receive clarification and recommended that this distinction be rectified with the audit firm (CFR 3.8, 3.9). When pressed for documentation, college leadership was able to provide the original articles of incorporation and the IRS letter, which defined the organization as a 501(c)(3) entity (see Appendix: Articles of Incorporation – Pathways College and IRS Letter/Notification of 501(c)(3)). However, they were unable to provide documentation of the change in state registration with the Secretary of State or updated articles of incorporation. This has been an ongoing concern of the prior visit team and the Commission, as documented in the Commission letter dated July 18, 2024 (CFRs 1.1 and 1.8).

The team concludes that Pathways College's financial position is unsustainable, with single-source donor funding serving as the primary revenue stream, and there has been no significant progress toward Title IV federal financial aid approval (CFR 3.4, 3.5, 3.6). The institution's dependence on Title IV approval permeates marketing, enrollment, and budgeting processes, leading the team to assess long-term financial stability as seriously jeopardized (CFR 3.4). The combination of technical barriers, administrative delays, and structural dependencies creates systemic vulnerability that compromises institutional capacity for sustainable operations and mission fulfillment.

Issue 3: Status and documentation of formal commitments from donors for projected student scholarships

An ongoing concern for Pathways College has been its single source of revenue, which is scholarship donations from Hawkeye Properties and Workforce Innovation, Inc. As best can be seen in the institution's financial statements and from conversations with key leadership members, there is no tuition revenue, per se, being received by the institution. Costs for enrolled students are covered by the donations received by the college from this entity. When pressed about the CFO's estimation that with the current revenue (meaning when the current gift is exhausted) and expense structure, giving the institution a 3-year runway of solvency, the chancellor stated, “Tell me what you need. We can get documentation for additional gifts.” As an undergraduate institution, this 3-year runway is shorter than the time it would typically take a student to complete a bachelor’s degree program, and indeed, it is not an acceptable lens for assessing long-term financial sustainability and viability (CFR 3.4).

In addition to the apparent largess from the named organization, without the benefit of a documented long-term commitment to ongoing support, the team has found a tangled web of relationships and connections between Hawkeye Properties and Workforce Innovation, Inc. (https://hawkeye.org/about/), John Hall, stated President of Pathways Management and of Higher Education Management (https://www.linkedin.com/in/john-hall-76baa8299/), and original incorporator of Pathways College (see Appendix: Articles of Incorporation – Pathways College, filed October 13, 2015) as well as Hawkeye Properties and Workforce Innovation, Inc. see Appendix: Articles of Incorporation – Hawkeye Properties, filed April 9, 2010). Pathways College provided the service contract (see Appendix: Services Agreement) with Higher Education Management (HEM) but made no mention of the subcontractor, 9Dot, a key contributor, given that the institution’s CFO is a member of the 9Dot team. The visiting team remains unclear about the relationship between HEM and 9Dot, as no service agreement for the CFO has been provided. In the opinion of the visiting team, the intertwining of each of these organizations is significant, particularly since the institution’s primary funding comes from Hawkeye Properties and Workforce Innovation, Inc., and the service agreement with HEM outlines a revenue-sharing partnership, which it appears not to be currently being paid due to the nature of the tuition revenue-sharing fee model. The deeper the team explored to find answers to the solvency of Pathways College, the more concerning the team became regarding its long-term viability (CFR 3.4). Overall, we find the college out of compliance with matters concerning transparency, conflicts of interest across the organization, and financial sustainability (CFRs 1.3, 1.7, 1.8, 3.4, 3.5, 3.7, 3.9, and 3.11).

SECTION III – OTHER TOPICS, AS APPROPRIATE

Standard 1- Integrity and Transparency CFRs 1.3, 1.7, & 1.8

During the course of this Special Visit, the team encountered significant challenges in obtaining clear and comprehensive information about key institutional relationships and stakeholder identities, requiring substantial independent research to understand the full scope of Pathways College's operational structure and dependencies. The institutional report and supporting documentation provided limited transparency regarding the specific identities, relationships, and decision-making roles of critical stakeholders, particularly concerning donor organizations and their principals. The institution's approach to transparency appears to be reactive rather than comprehensive, providing information primarily in response to specific requests rather than offering full disclosure of relationships that could materially affect institutional operations, governance, or financial sustainability. This pattern suggests insufficient attention to CFR 1.3 regarding institutional integrity in communications, CFR 1.7 concerning transparency in governance and decision-making processes, and CFR 1.8 regarding clear and accurate institutional representation to external stakeholders, including its accreditor.

The team identified several specific instances where the institution has failed to meet WSCUC transparency requirements. The team was unable to locate the institution's Notice of Concern on the WSCUC website, as required by Commission policy, which states, "A Notice of Concern is public information and is posted on the WSCUC website." Additionally, per WSCUC Commission letter dated August 29, 2024, "The Commission expects that the team report and this action letter will be posted in a readily accessible location on Pathways 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." However, the team was unable to locate these required documents on the Pathways website. Pathways College appears to lack 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.

Pathways College must develop comprehensive transparency frameworks and communication protocols to ensure full compliance with WSCUC standards for stakeholder communication and honest disclosure to the Commission and the public. Because the website is the public face of the institution, it is imperative that the content on the website be current and that the data contained address the requirements of an accredited institution in support of consumer protections (see the WSCUC Requirements for Institutional Websites Guide, revised August 2023).

SECTION IV – FINDINGS, COMMENDATIONS, AND RECOMMENDATIONS

The Team commends Pathways College for its:

1. Commitment to serving non-traditional students through accessible and affordable higher education opportunities. The college is committed to providing a quality education that lessens the financial burden on students by leveraging donor funds for scholarships and pursuing grants and partnerships with other colleges.
2. Recognition of non-traditional experiential expertise in the selection of Board members, showing the value of lived experience as a guide for institutional direction. This demonstrates the Board's commitment to diverse perspectives in governance by incorporating and encouraging varied viewpoints in decision-making. The Board is to be commended for its inclusive governance structure.

The Team recommends Pathways College consider the following proactive actions:

1. **Financial Stability and Long-term Viability** (CFRs 3.4, 3.5, 3.8, 3.9, 3.11). Financial stability and long-term viability are the cornerstones of institutional effectiveness; Pathways is encouraged to:

a. Develop realistic, multi-year budget models based on scenarios that are not dependent on single source donor funding, Title IV federal financial aid, in-kind services and incorporate various revenue streams.
b. Ensure the multi-year budget models integrate strategic enrollment planning, academic and student support services.
c. Assess the current staffing structure and develop future staffing plans with a focus on for appropriate internal controls, separation of duties and expertise needed in each position/role.
d. Proactively identify and address the issue(s) causing the delays in obtaining Title IV federal financial aid.
e. Ensure key stakeholders understand and recognize the criticality of financial stability and the importance of contingency planning as part of the annual budget preparation cycle.

2. **Develop Comprehensive Strategic Plan** (CFRs 1.1, 4.8) Mission clarity and strategic alignment are essential for institutional effectiveness and sustainable growth; Pathways is encouraged to:
    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. **Implement Systematic Program Review & Assessment** (CFRs 2.4, 4.1, 4.2, 4.4, 4.5, 4.6)

A culture of assessment and continuous improvement ensures that student outcomes are met, and curricular and co-curricular programming remains relevant to students' developmental needs. Pathways is encouraged to take the following actions:

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 disaggregated retention and graduation rates for all programs and student populations

4. **Enhance Institutional Transparency** (CFRs 1.7, 1.8). Institutional transparency and clear communication are fundamental to maintaining stakeholder trust and regulatory compliance; Pathways is encouraged to:

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.

APPENDICES (if applicable)

- Articles of Incorporation – Pathways College
- IRS Letter/Notification of 501(c)(3)
- Articles of Incorporation – Hawkeye Properties and Workforce Innovation, Inc
- Articles of Incorporation – Higher Education Management, Inc
- Services Agreement