

August 3, 2018

Joseph M Daisy, EdD, President and CEO  
College of Micronesia – FSM  
P.O. Box 159, Kolonia, Pohnpei  
Federated States of Micronesia 96941

Dear President Daisy:

It has come to my attention that a number of operational practices at the College of Micronesia may be found to be out of compliance with the Standards set by this agency and which prescribe the terms by which COM-FSM maintains its accredited status. In particular, these concerns center on the role of the governing body, the Board of Regents (BOR) for COM-FSM, and its appropriate exercise of authority in the operations of the College.

The concerns I will address in this letter are expressive of what are universally regarded as best practices in the operations of any college and which have been codified in the ACCJC Standards of Accreditation. Specifically, the role of the Regents, both individually and collectively, is the focus of these concerns. Since the BOR has officially endorsed the College's application for ACCJC accreditation and subsequent reaffirmation, it is appropriate for me to reference the specific Standards. Please note the following:

Standard IV.C.12: The governing board delegates full responsibility and authority to the CEO to implement and administer board policies without board interference and holds the CEO accountable for the operation of the district/system or college, respectively.

The matters of concern to this Commission relate to those occasions when individual members of the BOT directly interact with College staff, seeking to obtain information from them or to influence directly the work they are assigned to undertake. By bypassing the central administrative role of the CEO, the governance structure of the College is compromised. It can become an occasion for the private agendas of one individual to influence the mission and strategic goals of the College, apart from the formal positions of the BOR as a whole and as deployed via the College's CEO.

A related ACCJC Standard emphasizes the critical importance of the College following its own governance principles:

Standard IV.C.11: The governing board upholds a code of ethics and conflict of interest policy, and individual board members adhere to the code. The board has a clearly defined policy for dealing with behavior that violates its code and implements it when necessary.

Similarly:

Standard IV.C.7: The governing board acts in a manner consistent with its policies and bylaw. . .

Together, these two Standards require a board to be self-correcting. Should the board, or any of its members, act in a way that is contrary to its own codes, policies, or bylaws, the leadership of the board must take immediate action to modify such behaviors.

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I am bringing these matters to your attention because – as you know – COM-FSM has emerged from a difficult era of sanctions imposed by this agency, which have in turn crippled an institution that is vital to the future of the FSM. It is my understanding that, when the College was under a Probation action by ACCJC from 2011 to 2013, the Department of the Interior froze significant development funding essential to the College's growth. This underscores the degree to which branches of the United States federal government defer to the judgments of the accrediting association to ensure that a college is operating with integrity and efficiency. It would be extremely unfortunate for the College to slide toward a similar status at this critical moment in its promising development.

As you recall, a review for reaffirmation requires a peer review team to ascertain that the College remains in compliance with the commitments it made at the beginning of our relationship, as expressed in Eligibility Requirement 21:

The institution provides assurance that it adheres to the Eligibility Requirements, Accreditation Standards and Commission policies, describes itself in identical terms to all its accrediting agencies, communicates any changes in its accredited status, and agrees to disclose information required by the Commission to achieve its accrediting responsibilities. The institution will comply with Commission requests, directives, decisions and policies and will make complete, accurate, and honest disclosure. Failure to do so is sufficient reason, in and of itself, for the Commission to impose a sanction or to deny or revoke candidacy or accreditation.

This Requirement also underscores your responsibility as President to keep this office informed about any issues that could compromise the accredited status of the College. I am requesting that, in close collaboration with BOR Chairman Mr. Waguk, you provide to me a written verification that each Regent understands and abides by both the Standards of this Commission and the bylaws governing your institution.

The ACCJC Commission respects the leadership you have brought to COM-FSM as evidenced by the stable and positive status it has enjoyed with our agency since 2013. We are most eager to resolve the issues identified herein so that the College can continue to fulfill the vital role that it plays in ensuring the future of FSM.

Please let me know how I may assist in achieving a resolution of these matters.

Sincerely,

A handwritten signature in black ink, appearing to read "Richard Winn", with a stylized flourish at the end.

Richard Winn

CC: BOR Chairman Waguk