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August 1, 2014

VIA EMAIL AND FIRST CLASS MAIL

L. Jill Hans
Deputy Secretary of Postsecondary and Higher Education
Pennsylvania Department of Education
333 Market Street
Harrisburg, PA 17126-0333

RE: Wilson College Application for Certificate of Authority to Amend Articles of Incorporation

Dear Deputy Secretary Hans,

This letter constitutes the post-hearing statement of the Limited Participants. A copy has been sent by electronic mail today to Elizabeth A. Maguschak, counsel for Wilson College. This letter expressly incorporates all previous filings by the Limited Participants and Wilson College Women, including all attachments thereto.

On June 16, 2014, Wilson College had yet another opportunity to explain the legal basis for its decision to implement fundamental changes in the College's Charter and mission without the Department's prior approval, as required by Title 24, section 6504, of the Pennsylvania Consolidated Statutes. Despite this opportunity, the College failed, once again, to offer any justification for its actions that is consistent with applicable law and regulations. Instead, the College attempted to explain away its actions with an array of contradictory arguments. The College even claims that it does not need the Department's approval to dissolve the 145-year old women's college and replace it with a coeducational institution. Immediately after the hearing, while being interviewed by WITF Radio, President Mistick vowed that the College will continue to admit male students, regardless of the Department's ruling.

A simple truth has emerged in these proceedings. The uncontested facts we have presented show that the College has implemented coeducation and made other changes to its articles of incorporation without legal authority to do so, and it now seeks the Department's ex post facto approval of its actions. However, neither the Pennsylvania Code nor the Department's regulations permit the Department to sanction such actions after they have occurred. Moreover, the Department's approval process is mandatory and the Department is charged with making substantive review of all proposed changes to the charters of institutions of higher education.

In this letter, we summarize the arguments we presented at the June 16, 2014 Informational Hearing and direct the Department's attention to the inaccuracies and misrepresentations of law and fact in the College's arguments. The legal landscape, the uncontested facts, and facts explicitly conceded by the College, in addition to the negative inferences that must be drawn from the College's refusal to answer certain of the Hearing

Officer's questions and its failure to provide certain highly relevant information, all point in one direction and compel the denial of the pending application. The Department must act decisively in order to not only reverse the unlawful actions that threaten Wilson College's future but also to protect the public interest in preserving the women's college option and establish clear guidance for all institutions of higher education in Pennsylvania that may seek to change their charters.

1. Pennsylvania Law Grants the Department the Authority to Deny the College's Application

The Pennsylvania legislature did not create the Department of Education simply to serve as a rubber stamp, approving every decision made or action taken by the governing board of an institution of higher education. The Department's crucial oversight role is discussed in a February 24, 1992 Memorandum written by Peter Garland, then Acting Commissioner of Postsecondary/Higher Education. In this memorandum, attached for the Department's convenience, Acting Commissioner Garland reviews Title 24 and the Department's regulations and offers his conclusions regarding "the nature and extent of PDE's authority to control the expansion of institutions of higher education." He argues that the broad language of Title 24 must be interpreted to authorize the broad exercise of discretion by the Department and concludes that "the Secretary of Education does have authority regarding expansion efforts of institutions of higher education," including private institutions. The Acting Commissioner concluded as follows:

In some cases, this discretion may be greater than others. However, I see none of these situations as being purely ministerial, such that, if the institution satisfies the stated requirements, application approval must be given. Only the determination regarding the eligibility criteria for change of [State-related] status is ministerial in nature. ... Other application and review components are, however, subjective and involve the use of judgment. Thus a decision to disapprove, with reasons that are not arbitrary and capricious, is defensible.

The Department's authority and discretion to act is also evident throughout Title 22 of the Pennsylvania Code. Title 22 regulates and set standards for everything from the use of the words "college" and "university" to the minimum number of full-time faculty and the minimum endowment. Colleges and universities are required to file their course catalogs with the Department, and the contents of that catalog are specified in Chapter 31 the Code. Under section 6506 of Title 24 of the Consolidated Statutes, the Department has the authority to visit and inspect institutions of higher education and suspend or revoke the institution's certificate of authority if the Department finds that the institution has failed to maintain the standards and qualifications prescribed by the Commonwealth in Chapter 24. The statutory scheme clearly requires and authorizes the Department to take a substantive role in the regulation and oversight of the Commonwealth's colleges and universities.

Nowhere is this more evident than when a college or university seeks to amend its articles of incorporation. Title 24, section 6504 sets out the process, and it applies to *any and all* proposed amendments to the institution's charter. Thus, subsection (a) provides that "It is unlawful for any institution holding a certificate of authority under this chapter ... to amend its articles of incorporation ... without first securing the approval of the department with respect thereto." Subsection (c) provides that "The amendment of the articles ... shall be approved by order of the department only if and when the department finds and determines that such

fundamental change conforms to law....” In both subsections (a) and (c), the amendment of the articles of incorporation stands as a separate and independent clause, not modified or limited by the phrases that follow. The plain language of the statute can be interpreted in only one way: *every* amendment to a college’s or university’s charter is considered a “fundamental change” requiring prior approval by the Department.

The Department’s file for the College’s application to amend its charter in 1993 shows that the College understood and followed this statutory procedure when it sought to amend the Charter that year. This file did not become available to us until last week in response to a Pennsylvania Right-to-Know Law request. It is attached for the Department’s convenience.

The process undertaken by the College in 2013 that Attorney Maguschak described at the Hearing bears little resemblance to the process undertaken in 1993. Attorney Maguschak testified that she and her firm were retained in November 2012, two months before the Board of Trustees approved coeducation in January 2013, and at that time advised the College, apparently verbally, that it was not necessary to amend the present Charter to permit coeducation. Hearing Transcript, p. 114. Attorney Maguschak apparently did not contact the Department until May 2013 and at that time did not inform the Department that the Board of Trustees had already approved the President’s recommendation to make Wilson a coeducational institution, nor did she inform the Department that the College had already enrolled male undergraduate students and was marketing itself as a coeducational institution.

The evidence we submitted showing that coeducation has been implemented at the College is unchallenged by the College. The College does not deny that male undergraduate students were enrolled in the 2013/2014 academic year and that more male undergraduate students (although during the Hearing President Mistick refused to specify how many) will enroll in the 2014/2015 academic year. The College does not deny that coaches have been hired for male sports teams, that admissions counselors are recruiting male students, and that millions of dollars have been removed from the College’s endowment to upgrade and adapt facilities for these new students. These material facts are undisputed.

2. Coeducation is a Fundamental Change to Wilson’s Charter and Mission

As stated in the previous section, under section 6504 of Title 24 *any* change to a college or university’s charter requires prior approval by the Department. Even if the Department reads the statute differently, however, and the prior approval requirement applies only to proposed fundamental changes rather than to all proposed charter changes, there can be no rational disagreement that enrolling male undergraduate residential students in a college that has been operated continuously as a women’s college for 145 years is a fundamental change. The extensive evidence we submitted in support of this fact is uncontested by the College. Moreover, the College’s claims regarding the classification and treatment of male students in the Adult Degree Program (ADP) is flatly contradicted by the application, pricing, housing, and scheduling information that is available on the College’s current website at <http://www.wilson.edu/admissions/index.aspx>.

The College has argued that coeducation began at Wilson as early as the years following WWII, until we provided the statement of a Wilson alumna who attended Wilson at that time and testified that the small number of veterans who studied at Wilson lived off campus, did not have

their meals in the campus dining hall, had classes entirely separate from the women's college, and typically transferred to other schools after the first year. Limited Participants' Rebuttal 23.

The College has also argued that coeducation began at Wilson in 1970, when the Charter was amended to indicate that one of its purposes was to educate both women and men. In our Rebuttal and at the Hearing we presented extensive evidence regarding the reasons for the 1970 amendments, which appear to have been to permit the College to participate in exchange programs with area colleges and universities that are coeducational. In addition, we presented extensive evidence that the College considered making the fundamental change to become a coeducational institution, but after a lengthy process that included surveying the community, the College recommitted itself to its historic mission and held a press conference in Harrisburg to announce the decision. Rebuttal 11-13; Hearing Transcript 62-65. The College does not dispute these material facts. Moreover, after Gretchen Van Ness argued at the Hearing that the 1970 Charter is null and void as a matter of law and that legal effect must be given to the approval form used by the Secretary of the Commonwealth in 1993, which specifically states that the 1993 amendments "supersede the original Articles and all amendments thereto," Attorney Maguschak reversed course and conceded that the 1970 Charter has no present legal effect.

Finally, the College has argued that the language of the 1993 Charter authorizes coeducation. The basis for this argument is one phrase in the 1993 Charter that Attorney Maguschak has lifted out of context and interprets in a manner that defies common sense. That phrase is "without limitation," which appears in the first paragraph of Article 3 and precedes the list of the three specific "purposes" authorized by the Charter: (a) "in furtherance of its purpose as set out in the original charter," to operate a College for Women with a residential option and a separate coeducational College of Continuing Education; (b) to offer studies in the liberal arts as well as career and graduate preparation; and (c) to grant degrees, diplomas, and honors to students. Article 3's reference to the general charitable, educational and scientific purposes within the meaning of Section 501(c)(3) of the Internal Revenue Code is thus limited by the three specific purposes delineated in subsections (a), (b), and (c).

This is the only common sense interpretation of Article 3 of the 1993 Charter. If Attorney Maguschak's interpretation were correct, it would mean that Wilson College could operate as any charitable, educational, or scientific purpose permitted in the federal tax code. The College could convert to a hospital, or a health insurance company, or an animal shelter. It could be a foundation or a museum or an on-line university. If there truly is no limit in the 1993 Charter, all of these nonprofit purposes, and more, are permissible.

But the language of the 1993 Charter must be read as a whole. When Article 3 is considered in its entirety, it is clear that the 1993 Charter limits the College's purposes to operating a residential College for Women and a separate coeducational College of Continuing Education. The drafters' intent is obvious from the plain language of the Charter and the reference to Wilson's original Charter, but also from the 1993 documents attached to this letter. In addition to the correspondence with then counsel for the College, the Department's file contains the By-Laws of the Board of Trustees that were approved contemporaneously with the amended Charter on May 22, 1993. Article XIII of the 1993 By-Laws sets forth the College's Nondiscrimination policy, which follows in its entirety (emphases supplied):

Under the original charter granted by the Commonwealth of Pennsylvania, Wilson Female College was founded to educate young women in literature, science and the arts, *and continues to operate a residential college **exclusively** for women students.*

In the College for Women, women students, otherwise qualified, shall have equal opportunities to attend without discrimination because of race, color, religion, national or ethnic origin, personal handicap, sexual orientation or age.

In the College for Adult Learning, both men and women students, otherwise qualified, will have equal educational opportunities for admission without regard to race, color, religion, ancestry, national or ethnic origin, sex, sexual orientation or age.

In administering its affairs, the Board and the College shall not discriminate on the basis of race, color, religion, national or ethnic origin, personal handicap, sex, sexual orientation, or age.

Thus, far from abandoning or abrogating the College's historic mission, the 1993 Charter reaffirms it in its restatement of the College's purposes: to continue to operate a residential College for Women and to operate a separate coeducational College of Continuing Education. The 1993 By-Laws of the Board of Trustees confirms this reading of the charter, as does the prompt approval of the 1993 Charter by the Department and the Secretary of the Commonwealth. If the 1993 Charter in fact authorized unlimited actions by the College, as Attorney Maguschak argues, such a fundamental change would have been mentioned in Attorney Weldon's correspondence with the Department and, more importantly, the Charter most likely would have been rejected by the Department and the Secretary.

The College's current actions acknowledge this fact, even if its words do not. If the 1993 Charter permits the College to operate a coeducational institution rather than a College for Women, there would be no need for the College to amend the Charter following the January 13, 2013 vote of the Board of Trustees. In May 2013, however, the Board of Trustees approved the Charter amendments that are before you in the College's present application. The red-lined version of the Charter shows that the introductory paragraph of Article 3 remains unchanged but section (a), which currently provides that "in furtherance of its purposes set forth in the original charter, to operate a College for Women, which offers residential opportunity," has been replaced with these words: "to promote education of both women and men in undergraduate and graduate degree and non-degree programs." The reference to "the purpose as stated in the College's original charter" – which the founders stated in 1869 was to educate young women in the literature, sciences, and the arts – has been removed. The College for Women has been removed. The separate College of Continuing Education has been removed. These actions would not be necessary if the 1993 Charter permitted the College to dissolve the 145-year old women's college and replace it with any kind of nonprofit organization permitted under the federal tax code, including a coeducational institution of higher education.

In an attempt to bolster its flawed interpretation of 1993 Charter, the College argues that Wilson has been operating as a coeducational institution since the founding of the College of Continuing Education (now called ADP) in the early 1980s. At the Hearing, President Mistick argued that the educational opportunities and experiences for female students in the College for Women and male and female students in ADP are identical. The President's claim is patently

false. Here is a partial list of just some of the differences, taken from the College's current website (<http://www.wilson.edu/admissions/adult-degree-program/index.aspx>):

- The Adult Degree Program has a separate application form, different admissions criteria, and a different pricing structure. ADP students are not charged tuition as are students in the College for Women. Rather, they are charged a set fee for each credit hour.
- ADP students must be at least four years out of high school and at least 22 years old. CFW students may enroll immediately following their high school graduation.
- ADP students are not required to matriculate. CFW students must declare a major and complete a capstone project in their senior year.
- ADP students may study part-time. CFW students must be enrolled full-time.
- ADP students are not required to take classes on Wilson's campus and may complete their studies without ever stepping foot on campus. The College's instructional sites at the U.S. Army War College in Carlisle, as well as additional sites in Harrisburg, Mechanicsburg, Waynesboro, Greencastle, Hanover, McConnellsburg, Mifflintown, Lewiston, Biglerville, Hagerstown, MD, and at the Chambersburg Area High School, are used solely by ADP and certificate students. ADP students are not required to take classes on the College campus, while CFW students are not permitted to take classes at these other instructional sites.
- ADP students cannot participate in the College's athletics program.
- ADP students who wish to live on campus are housed separately from CFW students.

As the foregoing list demonstrates, much more than the "residential opportunity" separates ADP students from students in the College for Women. The College maintains detailed enrollment information and knows the exact number of male and female students in each program, but it has not provided this information to the Department. Because the College has chosen to withhold this enrollment information, the Department should draw a negative inference regarding the College's current claim that male and female students are treated identically and that the College for Women has been coeducational since the 1980s.

In view of the material and significant differences between the coeducational Adult Degree Program and the single-sex College for Women, there is no question that the College's decision to dissolve the College for Women and replace it with a coeducational institution constitutes a fundamental change in the College's charter and mission.

Furthermore, the College does not deny that following Board approval of the amended Charter in May 2013, it filed a "substantive change" petition with its accreditation agency, the Middle States Commission on Higher Education. On its website, the Middle States Commission explains, "When an institution is accredited, or its accreditation is reaffirmed, that action applies to conditions existing at the time of the Commission's decision." The Middle States Commission notes, "While the decision to modify an institution is an institutional prerogative and responsibility, the Commission is obligated to determine the effect of any substantive change on the quality, integrity, and effectiveness of the total institution." The Middle States Commission gives several examples of "substantive change." These include a "proposed change [that] appears to transform the institution so that it is significantly different from the institution that was granted accreditation in its most recent review," including "significant change in mission, ownership, student population, or institution type."
<http://www.msche.org/documents/P1.4-SubChangePolicyRev062614.pdf>

The dissolution of the College for Women and its replacement by a coeducational institution constitutes a significant change in mission, student population, and institution type. The College has not provided the Department with a copy of its substantive change petition that is currently pending with the Middle States Commission. In the absence of this evidence, the Department should draw the negative inference that the College has informed its accrediting body that the proposed Charter amendments represent a fundamental change in the College's Charter and mission.

Wilson College has not been coeducational since World War II, 1970, 1983, or 1993, despite what the College has variously argued in these proceedings. There is only one reason to twist the language of the 1993 Charter beyond recognition and ignore the extensive and uncontested evidence we have presented: the College knows that it improperly and unlawfully implemented the fundamental change to coeducation without timely notice to or the prior approval of the Department. It knows that this violation of section 6504 is a serious offense that carries criminal penalties. Rather than take responsibility for this offense, however, and cease implementation of its unauthorized actions, the College insists that it is above the law and that the Department has no authority in this matter.

3. The College's Refusal to Answer Certain Questions by the Hearing Officer

At the June 16th Hearing, the Hearing Officer inquired about the status of the three male commuter students who were admitted in Fall 2013. After President Mistick confirmed that these three students had completed their first year, the Hearing Officer requested information about the current composition of Wilson's male student body. President Mistick answered that the "12%" is comprised of every kind of Wilson student, including ADP students, but she failed to provide specific numbers. Attorney Maguschak then stated, "the 12 percent are in the "undergraduates" [sic] program, and "they sit in the same classrooms as our residential women students." As the previous discussion has shown, this assertion is patently false. While ADP students *may* take classes through the undergraduate College, many do not and many take no classes at all on campus.

The Hearing Officer then asked for the Fall 2014 enrollment number for undergraduate male students. After much back and forth, President Mistick stated, "I can't give you a final enrollment number for next year" purportedly because "we're a rolling admissions school." The Hearing Officer again asked, "But you can't say how many because it's rolling at this point?" President Mistick answered that "every year seems to have a different personality" and that "I think we're seeing very good interest in terms of the number of applications, the quality of applications to the institution, and we're very optimistic about the fall." Transcript 117-123.

President Mistick repeatedly refused to answer the Hearing Officer's very simple and straightforward question: how many male undergraduates have enrolled for Fall 2014 and are expected to be living on campus. Sitting in the audience were the College's Vice President for Enrollment as well as several admissions counselors. If the President of the College and its counsel did not know the enrollment figures, surely these individuals did. It simply beggars belief that two short months away from "Move-In Day," when the College must house a cohort of undergraduate residential male students and field male sports teams for the first time in its history, no one at the College knows how many male students are expected.

The Department should draw a negative inference from the College's repeated refusal to answer the Hearing Officer's questions about Fall 2014 enrollment. Whatever the reasons for the College's obfuscation, President Mistick's statements constitute an admission that coeducation has been implemented without approval by the Department.

4. The College Has Misrepresented the Proposed Charter Changes

Although the College attempted to misrepresent our testimony concerning the other proposed changes to the Charter, our argument has been consistent and correct. The proposed removal of the minimum faculty requirement, the changes in the minimum endowment requirement, and the changes in the phrase "literature, science, and the arts" in the 1993 Charter are *not* required by existing Pennsylvania law or by any recent changes in the law. We agree with the College's argument that Pennsylvania law does not require institutions of higher education to *include* the provisions of Title 24, section 6502(b) in their articles of incorporation and we have never argued differently. Our testimony is that the law does not require the provisions to be *removed* from the Charter and that good governance principles argue for their continued inclusion. We have testified that the College misrepresented the reasons for recommending these proposed changes to the 1993 Charter to the Board of Trustees in May 2013 and to the many former Trustees who joined the conference call with President Mistick, Board Chair John Gibb, Trustee Attorney Susanna Duke, and College Attorney John Stoviak on October 14, 2013. Section 6502(d) has not changed since the 1993 Charter was adopted and so there was no reason to change these provisions. The College's statements to the Board of Trustees and to the former Trustees misrepresented the law. Had the Board of Trustees known that Pennsylvania law has not changed and there is no requirement that these provisions be removed from the Charter, it likely would not have approved the changes.

5. The College Has Failed to Offer Evidence or Dispute Key Material Facts

The College has neither challenged nor presented evidence that disputes the key material facts presented by the Limited Participants, as follows.

- The College has not disputed our testimony that enrollment goals were artificially inflated and manipulated during the Commission process and in the materials presented to the Board of Trustees. The total enrollment goal established by the 2010-2015 Strategic Plan is 1,000 students across all programs. That number was increased to 1,325 when the Commission began its work in May 2012. In October 2012, the number was increased to 1,500. By November 2012, it had increased to 1,761.
- The College has not disputed our testimony that the College now states that the enrollment goal is 1,000 students across all programs, thus undercutting the justification for Board of Trustees' approval of coeducation.
- The College has not disputed the evidence that the 2010-2015 Strategic Plan achieves the enrollment goal of 1,000 students across all programs while remaining a College for Women.
- The College has not presented a new Strategic Plan or amendments to the existing 2010-2015 Strategic Plan.
- The College has not disputed our testimony that the Commission's work showed that the College could increase enrollment to 1,325 students while remaining a College for Women.
- The College has submitted no analysis that disputes the data analyses submitted by Paula Tishok that shows the flaws and mathematical errors in the financial and enrollment models upon which the coeducation decision was based.

- The College has not disputed our testimony that it was advised repeatedly to obtain an Opinion Letter of Counsel prior to implementing coeducation and it failed to do so.
- The College has not disputed the evidence that it has filed a “substantive change” petition with its accreditation agency, the Middle States Commission on Higher Education.
- The College has not disputed our testimony and the evidence showing that in 1970, and again more recently in 2009 and 2010, the College reaffirmed its mission as a College for Women.
- The College has not disputed our testimony that until January 2013, it had consistently held itself out as a College for Women to students, alumnae, and donors, as well as to faculty, staff, and administrators, and it had consistently described itself as a College for Women in reporting to state and federal tax agencies, state and federal regulatory agencies, as well as to grant makers and other funders.
- The College has not disputed our testimony and the extensive evidence showing that the College is currently operating as a coeducational institution.
- The College has not disputed our testimony and the evidence that Stevens Strategy, following extensive research and data analyses, concluded that Wilson should remain a women's college and not become an indistinguishable, coeducational institution.
- The College has not disputed our testimony and the extensive evidence that many women’s colleges are thriving and that the public interest is served by having this option available.
- The College has not disputed our testimony and the evidence that the Commission on Shaping the Future of Wilson College failed to examine any of the current internal operations of the College, such as recruitment and admissions, fundraising, alumnae relations, financial management, and marketing, to determine whether best practices are being employed and resources are properly allocated.
- The College has not disputed our testimony and the evidence that the Commission did not complete its work and made no recommendations concerning the future direction of the College, including coeducation.
- The College has not disputed the evidence, contrary to President Mistick’s repeated claim of “dire” financial straits, that both *Forbes Magazine* and *The Chronicle of Higher Education* gave the College’s FY 2011 finances their top grades.
- The College has not disputed our testimony that the many proposed changes in the Charter, including the removal of the minimum number of faculty and changes in the description of the protective endowment are not required to be consistent with Pennsylvania law, as the College claimed.
- The College has not disputed our testimony that Pennsylvania Senior Deputy Attorney General John Downing recommended to the College that it seek Orphans Court approval of coeducation and that no such *cy pres* action has been instituted by the College.

6. The Department Must Deny the College’s Application and Impose Conditions Protecting the Students, Preserving the Option of a Women’s College Education, and Providing Appropriate Oversight of the College

Section 6504 of Title 24 requires that *all* proposed amendments to the charters of institutions of higher education in Pennsylvania be submitted to the Department for approval prior to implementation. *All* proposed charter amendments are classified as “fundamental changes” by the statute. The failure or refusal of an institution of higher education to obtain the Department’s approval before implementing fundamental changes to its charter is a violation of law subject to criminal penalties. Moreover, neither Title 24 nor the Department’s regulations give the Department legal authority to approve an application for a certificate of authority filed *after* an institution of higher education has implemented fundamental changes to its charter.

The fundamental change to coeducation in Wilson College's charter will not benefit the Commonwealth or serve its long-term best interests. Pennsylvania does not need another small, struggling, coeducational liberal arts college. It does need to protect and preserve one of its few remaining women's colleges and the only women's college in the state that offers a residential program for single mothers with children. Women's colleges remain relevant today and continue to produce graduates who are more likely to be leaders in their communities, to successfully pursue graduate educations, and to be articulate problem-solvers guided by strong moral values. Women's colleges bring students to Pennsylvania, and women's college graduates greatly benefit businesses and communities throughout the Commonwealth. Rebuttal 15-22.

The Department must act to ensure that the College ceases its intentional and continuing unauthorized and illegal actions. This matter should be referred to the appropriate authorities for legal action. In addition, the Department is authorized to enter appropriate conditions to ensure that lawful and responsible management is restored to the College. We also urge the Department to enter appropriate conditions to ensure that all currently enrolled students, female and male, are given the opportunity to complete their studies. Finally, the College should be prohibited from filing a new or amended fundamental change application until it has satisfied the Department that it is no longer operating in violation of the law and of its current Charter.

In closing, we respectfully bring to your attention two issues we wish preserve for appeal, should the need arise: (1) the Department's denial of our request to intervene and participate as formal parties in this matter, and (2) the Department's decision just weeks before the Hearing to permit three persons to speak for the College who had not submitted written testimony prior to the Hearing, which constitutes unfair surprise and prejudice.

Wilson College Women continue to stand ready to assist and support our alma mater and its Charter and mission. We are deeply grateful to the Department for the care and attention it has given to this important matter.

Sincerely yours,

Gretchen Van Ness for
Paula Tishok, Melissa Behm,
Kendal Hopkins and
Wilson College Women

Enc. (2)