



Webber International University
Babson Park, FL
Established 1927

The Honorable Kathy Manning
United States House of Representatives
415 Cannon House Office Building
Washington, DC 20515



St. Andrews University
Laurinburg, NC
Established 1896

June 24th, 2021

Dear Representative Manning:

After having left several messages with your office, I write to share my concern regarding the inaccuracies contained in your June 14th, 2021 letter to Secretary Cardona, many of which having been circulated for years are now seeing new life, no truer than before, circulating under your letterhead and with the credibility which your office brings to anything you say.

I fully understand, and indeed, share your concern with protecting the taxpayer from unscrupulous, fly-by-night “schools” some of whom have, over the years, left students with little to show for their time except for debt. But, as 125 year old not-for-profit university which serves – admirably and unapologetically – traditionally underserved populations, I think that basic decency requires that you not lend the credibility of the United States Congress – one of the most rightly revered and rightly respected institutions on the planet – to unfounded, or worse yet patently false, allegations. The thousands of contributing members of society who hold a St. Andrews diploma and the hundreds working on one deserve the basic decency of not being the victim of a Member of the US Congress falsely speaking ill of them.

I will agree that Webber has indeed rendered St. Andrews into “an unrecognizable institution in the eyes of your constituents”. St. Andrews was indeed a proud institution when I graduated in 1987... we were taught critical thinking, verifying one’s sources, the importance of writing well, the importance of true inclusion (long before ADA codified decency towards the disabled, the nation’s first barrier-free college, St. Andrews, had fully assimilated the self-styled “the wheelies” into campus life). When Webber showed up in 2011, St. Andrews been removed from SACSCOC membership, exhausted its SACSCOC appeal, lost its federal court case, lost its appeal thereto, and was running, at about 10% capacity, on a stipulated temporary injunction for the year SACSCOC gave it to find a buyer (St. Andrews Presbyterian College v. Sacs., 679 F. Supp. 2d 1320 (N.D. Ga. 2009)). Most of the people on its campus attended the high school to whom it rented space to try to pay the bills. Its 50+ year old air conditioner needed a \$1 million replacement. As it did at many small

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liberal arts colleges, the model had failed. The vultures were circling and rather than wait a few months to buy it for pennies on the dollar from the bankruptcy court and erect a Webber where St. Andrews once stood, we undertook to merge the living – albeit on life support – school into ours and to move the model to sustainability. Frankly, in a perfect world I'd like the place to look a lot like Princeton – highly sought out for its much needed driven degrees yet with every graduate having a liberal arts degree irrespective of his or her major (in the case of Princeton even engineering graduates). And none of that deserves an apology to anyone. But as you are well aware, much of this has not sat well with a very small group of elitist alumni who wish to hoard the transformational value of a college education. Having complained loudly to me that they don't like some of the new degrees (especially the Bachelor of Science in Nursing) or the immutable characteristics of some of our students who are attracted to our new degrees and new sports (in the last week one complained to me "those people will have the same degree I do"), they moved to the trustees, then to a blogger, and now to you. And while we have suggested that perhaps they ought not let their ice cream melt while counting someone else's sprinkles, unfortunately to the detriment of good students who went to a good school their allegations – baseless as ever – are now being circulated under the letterhead and over the signature of a Member of Congress. And that, ma'am, simply isn't fair. Basic decency requires that those whose voice is amplified by a portfolio of degrees and a position of power speak the truth.

And here are a few ways your letter strayed from the truth in ways which even the most basic of fact checking would have revealed:

Board Membership: Dr. Arthur Keiser is not now, nor has he ever been, a member of the board (technically there are two identical boards, Webber International University, Inc., a Florida not-for-profit corporation and St. Andrews Presbyterian College, Inc., a North Carolina not-for-profit corporation doing business as St. Andrews University, a branch of Webber International University, but Dr. Keiser is not now nor has he ever been a member of either). Likewise, the statement that "in 2018 most members of these school's joint board of trustees were replaced" is simply false. I am not certain what "people connected to Dr. Keiser" means – like you I'm "connected" to thousands and thousands of people – but to my knowledge nobody on our Board works or has ever worked for Keiser or a related entity, is now or has ever been a Trustee for Keiser or a related entity, or has any other relationship with Keiser, a related entity, or for that matter any other entity, which would present an actual conflict or the appearance of a conflict of interest.

Contributions and Conflicts: I'm now at the point in my career where I've had my fair share of interviews, and if "what's the largest gift you've received" isn't the first question a candidate for a college presidency is asked it's usually the second (some do ask "how are you" first).

Donations are the currency of success amongst college presidents and most of us spend most of our days asking for them. While we rely less on donations than do most not-for-profit colleges, they're still a big part of our budget. As you are well and personally aware from your service with the not-for-profit Bennett College when they received a seven figure, unrestricted donation from the not-for-profit High Point University, one not-for-profit institution of higher learning helping another out is hardly without precedent or by definition driven by sinister motivation. Indeed we occupy some of Southeastern College's space, rent free (two other for-profit entities – a community bank, a real estate developer, as well as a public community college – also provide us with rent free space). Aid in kind to not-for-profit corporations is neither odious nor uncommon and we are no more indebted to Southeastern College for the free space they provide us than we are to Chili's for the free food they provide our boosters during home football games. As you well know from your work with a small, private, resource lean not-for-profit college, philanthropy – the true giving from the heart that which one could have stashed in a hedge fund instead – keeps private, not-for-profit (and to a lesser extent some "public") colleges humming.

Change in Campus Leadership: While not prerequisites for leadership in either SACSCOC standards or USDE regulations, stating that Bernhardt has a "lack of experience or academic credentials in non-profit education" is simply false (and refuted in the very same paragraph which notes her experience at the not-for-profit Keiser University). The shocking implication that one being enrolled in a program of continuing education at an institution other than the one at which they work renders them unemployable due to conflict of interest is ludicrous and, in fact, anathema to quality improvement – like most colleges and universities we encourage our employees to continue their education, often even requiring and paying for it. Yesterday we celebrated the news that one of our administrators has been accepted to a doctorate program at Virginia University rather than worry about how this might affect her performance because, candidly, the very notion that an institution would leverage the grades of its students to influence their decisions at a competing institution is, well, incredible. And, of course, interim presidents are common at institutions of higher education with at least scores of them serving at any given time at institutions ranging from community colleges to land grand institutions.

Enrollment Growth: It is technically true that “prior to combining with Webber, St. Andrews was ... a single campus”. But “prior” in this case refers to the 1980’s and is therefore quite misleading. Like Webber, St. Andrews has had two campuses – with one collocated at another educational facility and providing mainly teacher education to primarily working adults – for at least seventeen years. And while it is probably true that at some point in its history St. Andrews had only 14 programs in the arts, sciences, and business, since this was before the early 1980’s when I arrived as a student, it is rather misleading.

Program Growth: The new programs – mainly in fields in demand by employers – added to St. Andrews have been added over the course of a decade rather than over two years. And, at the risk of being drawn into the elitist conversation about which professions which empower human decency and enable one to feed his or her family are somehow “worthy” or “respectable” and which are not (I was the first in my family to go to college; my father was a concrete finisher and before landing a job as a bank teller my mother picked cotton) it becomes challenging to ascertain which of our new programs are being defined pejoratively as “career training”... the Master of Business Administration? The Master of Arts in Education with an emphasis in Instructional Design and Curricular Supervision? The Bachelor of Arts in Special Education? The Bachelor of Science in Biology with a Specialization in Biomedicine? The Bachelor of Science in Chemistry with a Specialization in Forensic Science? And, of course, even if some schools with bad outcomes did offer some of the same programs, what has this to do with us? There is simply no basis in fact to disparage these programs as either “career training” – whatever that means – or associated with bad outcomes.

New Campuses: Prior to the merger in 2011, St. Andrews and Webber each had two campuses. Each had a residential campus and each had a campus on a nearby community college where they offered mainly continuing education courses mainly to working adults. And, both Webber and St. Andrews have offered on-line courses for over a decade with Webber having been authorized to offer its entire catalog on-line for over fifteen years. The defamatory allegation that St. Andrews is new to the world of adult or on-line education is simply false.

Substantive Change: As a member of the Executive Council of the Southern Association of Colleges and Schools and the Chair of Florida’s delegation thereto, I receive every other week a huge stack of substantive change requests to review; from this vantage point I suspect very few people realize just how many changes cross the “substantive” bar and therefore require approval. Some of the changes at St. Andrews did

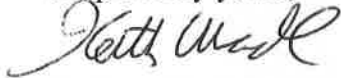
indeed cross this bar and were indeed approved; the implication that approval was neither sought nor received is false and defamatory.

I am not seeking to change your mind on for-profit education (my own opinion is that, as with every sector, some is good and some is bad). I really have no opinions on HR 2700... if it is passed tomorrow without modification, it would have zero impact on me or my institution. And I certainly am not asking you to ignore allegations – however fanciful and conspiracy theory laden they may be – from your constituents. But what I am asking is that you treat our alumni, our students, our faculty and staff with basic human decency. And recirculating information which you know, or through exercising the most minimal due diligence would know, to be false just isn't decent. Of all people, a lawyer and a politician should from personal experience with their detractors know that just because someone says something doesn't mean it's true. But as a lawyer and a politician you also have a special duty: the people have are right to expect that if a statement appears under the letterhead and over the signature of a Member of Congress – irrespective of how impassioned a Member might be or what that Member's opinions might be – that that statement is true. That is the power of your office. And the aforementioned letter falls far short of that duty.

We are a 125 year old institution providing, largely to first in family to go to college students and largely to students who identify as minorities and comparatively economically, a transformational education and a ticket to the middle class, and providing the people of one of North Carolina's most improvised counties with good jobs and good benefits, and what we ask of you – all we ask of you – is a fair shake. Because of your education, your accomplishments, and your office when you say something people rightly believe it, and much of what you said in your June 14th letter is false. If you have concerns or questions, my staff and I are always at your disposal. I extend the invitation again, come see for yourself what we are and what we are doing.

Thank you for your service to, and concern for, the American people.

Respectfully yours,



H. Keith Wade, DBA, CMA, CFM, LBBP
President, CEO, and Saint Andrews Class of 1987 graduate