



**ACCREDITING
COMMISSION
for COMMUNITY and
JUNIOR COLLEGES**

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January 20, 2010

Dr. Jack Scott, Chancellor
Chancellor's Office of the
California Community Colleges
1102 Q Street
Sacramento, CA 95814-3607

Dear Chancellor Scott:

We are writing on behalf of the Accrediting Commission for Community and Junior Colleges (the Commission) to respond to your suggestion, developed with your Consultation Council, made for "improvements" in the operations of the Commission. These requests were made in writing and at a small group meeting on October 26, 2009, and were reiterated by you in your statement before the Commission on January 8, 2010. The Commission wishes to thank you for taking the time to come to our meeting and share your ideas.

The Commission has asked that we begin this response with a brief description of the nature and the role of the Commission. The ACCJC, part of the Western Association of Schools and Colleges, is a private, 501 (c) 3 (non-profit) organization comprised of institutions who voluntarily commit to meet accreditation standards and policies. The purposes of the ACCJC are to provide quality assurance to the public that its accredited institutions meet standards of quality, and to promote institutional improvement through recommendations for improvement developed by peer review teams and the Commission.

The ACCJC accredits institutions in California, Hawaii, the Republic of Palau, the Republic of the Marshall Islands, the Federated States of Micronesia, the Commonwealth of the Northern Marianas, American Samoa, and Guam. The Commission institutional membership includes private and public member colleges, including colleges owned by corporations traded on the stock exchange. Fundamental principles of accreditation and policy define the Commission's members as the individual institutions that the Commission accredits, and the Commission has a one on one relationship with each of its member institutions.

The U.S. Department of Education recognizes the ACCJC as a reliable indicator of quality, and regularly reviews the ACCJC's adherence to federal laws and regulations. The ACCJC undergoes an evaluation by the Department of Education every five years, and must demonstrate that it is in continual compliance with federal laws and regulations, expressed in the review as criteria for recognition.

Those laws and regulations also set out specific expectations and requirements for the ACCJC with regard to its Standards of Accreditation. One of those requirements is that the ACCJC enforces its standards of quality equitably on all institutions in its membership. This federal recognition allows institutions accredited by the ACCJC to be eligible for federal funding and student financial aid.

The last decade has brought public attention to accreditation, and to institutional quality, as never before. Accreditation status of an institution has become an increasingly important signal to students and the public that the institution meets defined standards of quality. The public has the right to know about institutional quality, and accreditation status is one of the key indicators of quality.

Your written document begins with the idea that your seven suggestions (in bold type below) are made in the spirit of collaboration. The Commission appreciates that, and its responses include some suggestions of how the Chancellor's Office and other California Community College associations can help California Community Colleges to better comply with, and exceed, the ACCJC's Standards.

1. Develop the means for colleges to provide periodic feedback to ACCJC on the accreditation processes and their experiences, including both commendations for what went well and identification of what needs improvement.

The ACCJC has in place numerous mechanisms for feedback from member institutions, as follows:

- Every six years, the Commission conducts an extensive External Review that asks institutional members to respond to questionnaire, interview and focus group questions about ACCJC processes and their effectiveness. The results are used to make improvements in ACCJC processes. The last External Review was completed in 2007, published in 2008, and is used as the basis for Commission planning and improvement. All institutions received a copy of the External Review Report.
- The Commission asks participants to evaluate its evaluation-related training events including self study training provided for colleges, and team and chair training provided for teams. All CEOs of colleges undergoing comprehensive evaluation review are asked to evaluate the team visit at the conclusion of the evaluation process.
- The Commission currently asks participants in most Commission-sponsored workshops to provide feedback on the content and utility of the training sessions.
- Policies provide the opportunity for the Chief Executive Officer of any institution undergoing a team review to respond to errors of fact in a team report and to respond in written form and in person before the Commission.
- The process for changing the Standards of Accreditation involves an external review, formation of work groups representing institutional members for suggested revisions to the Standards, and extensive opportunity for institutional comment on draft language before adoption.

Through these mechanisms, and the contact that individuals from member institutions or the Commission staff initiate, the Commission believes it *is* getting ample feedback from its member institutions and from individuals engaged in accreditation activities.

2. Strengthen standards-based training of both visiting team members and ALOs.

The ACCJC works actively to promote understanding of accreditation among its member institutions and evaluation teams. The Commission is concerned about the reliability and consistency of its evaluation processes and therefore has invested considerable effort in the training for evaluation team members preparing for an accreditation visit. The Commission publishes several manuals and guides. These include the *Accreditation Reference Handbook*, the *Guide to Evaluating Institutions*, the *Substantive Change Manual*, and the *Distance Education and Correspondence Education Manual*, which are readily available on the ACCJC's website. These are given to several hundred team members each year and shipped to every member college each August. Interested parties can find all manuals and the Standards on the ACCJC website and download them for study.

The Commission trainings are all Standards-based. The Commission is always interested in suggestions for ways to improve training; the feedback that the Commission gets from those undergoing training is largely very positive, but the suggestions for improvement that are made lead to annual adjustment in the training curriculum.

In addition to team training and self study training provided to colleges undergoing the six year review, the Commission provides several other workshops on a regular basis.

- ALO training is provided each November at the Community College League of California (CCLC) Conference; it is also being provided at the annual WASC ARC in April.
- The Commission has offered a workshop called "Accreditation 101" for several years at the CCLC Conference.
- The Commission develops, as it is able, electronic media-based training on basic accreditation topics. Conference call seminars are available on some of the basic training modules.
- The Commission has several workshops that explicate portions of the Standards, and offers them regularly at conferences of professional associations and at individual institutions, as invited. These include:
 - Program Review and Integrated Planning
 - Board Governance and Leadership
 - Accreditation Basics

The Commission encourages ALOs to come to the annual ALO workshops as well as other Commission presentations on accreditation. Institutions and individuals, including the ALO and other campus leaders, can better learn and understand the Standards if they avail themselves of the materials and training sessions repeatedly. Over the course of a few years, a better understanding of accreditation comes rather readily.

Accreditation is higher education's system of self regulation. It is a peer review process, and ALOs, as well as faculty, college administrative leaders and trustees have a professional obligation to read, seek to understand and apply the standards to their own institutions.

Accreditation is a complex concept and process, and not everyone is destined to become an expert. Changes in federal laws and regulations, and resultant changes in Commission policies, create almost annual adjustments to accreditation. The Commission believes it important to control the content and delivery of its training on accreditation in order to assure accuracy; therefore, the Commission does not train other parties to conduct training on the accreditation.

That being said, accreditation standards are fundamentally *designed to promote institutional good practices that lead to educational effectiveness and student success*. It is institutional members – faculty, academic administrators, finance officers, researchers, trustees and others -- who will best be able to share examples and ideas for institutional practice that promote student success and meet accreditation standards. Colleges are doing this at their many annual conferences and workshops. Anything that colleges or the California Community College system can do to promote good practice and to encourage sharing of good practice will help colleges become more successful in meeting accreditation standards.

Consider instituting an annual multi-day statewide California Community College conference to provide training and information to all interested constituencies. This could be co-presented with the Academic Senate and the CC League at the November annual CCC conference. Colleges could also present their best practices.

The Commission has a responsibility to provide training to all of its member institutions across the Western region. The Commission has many workshops and training activities each year; these are posted on the Commission's website and advertised in the middle section of the Commission's online (and hard copy) newsletter, *ACCJC News*. We have also attached a list of workshops provided over the past eighteen months.

The Commission already has an annual accreditation meeting as well as ongoing assessment workshops. In 2009, the Commission initiated an annual accreditation conference in conjunction with the senior college commission of WASC. Since the Commission has eight "states" and several types of institutions in its membership, it will invest most heavily in the conference that brings together the variety of institutions accredited by the ACCJC. The Commission believes this will stimulate sharing of good practices and innovation within the region.

The WASC Academic Resource Conference (ARC) is held every April in California and features presentations by the Commission on various accreditation matters, a workshop on accreditation for new CEOs, and best practices presentations by institutional members of both higher education commissions, as well as keynote speakers on key quality assurance topics. The Commission intends this conference to be its key means of reaching all of its member institutions, and facilitating sharing among all two and four-year WASC members.

The two WASC higher education commissions have been sponsoring workshops on assessment for higher education faculty for about six years. We began conducting these workshops with the American Association of Higher Education and then continued them as WASC workshops when the AAHE ceased operations. The workshops help programmatic faculty define learning outcomes and develop assessment and improvement strategies. There will be four workshops offered in the current academic year. At each session, about 50-70 community college faculty are now participating along with an equal number of faculty from four year institutions.

The Commission is already partnering with the CCLC and the Academic Senate on training workshops.

The ACCJC has been offering workshops on accreditation at California public college conferences for many years. The Commission has accepted invitations from the CEOs, the CBOs, the internal auditors, the Academic Senate, the CIOs/CSSOs, ACCCA, and the researchers to make presentations or to participate in panel discussions of accreditation. The ACCJC has been offering accreditation workshops at the League's annual conference for many years, and at the CCCT for at least the last three years. The Commission co-sponsors the Student Success Conference each October with the Academic Senate and the RP Group; an accreditation strand has recently been included in that conference. The Commission also participated in the California Assessment Institute with the RP Group from 1998 to 2003.

The Commission is always open to invitations to present information and to suggestions about content of presentations. If the associations want such training they should contact the Commission directly. The Commission staff is quite small in number, so advance planning is important. There are occasions (and certain months) when staff may not be available due to the demands of the Commission's core work.

The ACCJC offers institution-based training on demand as time permits. It has repeatedly informed California colleges that it is also available to make regional presentations and workshops should the institutions be willing to arrange them in conjunction with other regional meetings. The Commission has trained many governing boards and others through this process. Given the small size of the Commission staff, regional or state wide meetings can reach more institutions than individual college training sessions can, and so are given preference by the Commission.

Institutional Responsibility for Leadership

The Commission recognizes that the large number of retirements that have occurred, and will be occurring over the next few years, have drawn many new faculty and administrators into colleges, and those newer hires may lack knowledge and experience with accreditation. Institutions might encourage new staff to come to the many venues in which the Commission provides training and information, and to use the Commission's website and newsletter to access needed information and resources. The Commission's workshop for New CEOs, offered at the WASC ARC, offers an accreditation orientation for new executives.

Since the Standards describe institutional good practices, those newly hired or advanced into leadership positions are also likely deserving of training in institutional good practices that will help their institutions be effective. The Commission suggests that the California Community College system itself develop strategies for advancing the skills and knowledge of the newer generations of institutional leaders and employees. Sound assessment practices, good fiscal management, program review practices that focus on improving student success, governance practices that engage employees in meeting the institution's mission – these are all institutional good practices that are not accreditation-specific, and which can be promoted through training provided by the California Community College system and its various organizational affiliates. For example, the Chancellor's Office contracted with Dr. Norton Grubb of UC Berkeley several years ago to conduct trainings for faculty across California. Such initiatives are helpful to institutions.

It often seems to be the case that those individuals and institutions that most misunderstand accreditation are those who don't take advantage of existing accreditation training activities. While the ALO and "executive leadership" sessions that the Commission sponsors at the CCLC each year are well attended (by persons other than CEOs), efforts to engage CEOs directly in workshops and discussions of important accreditation news are often unsuccessful. In other instances, the same leaders attend repeatedly and update their knowledge, while others are repeatedly absent.

Standard IV.B.2. describes the important role of the college president in setting the institutional expectations and processes that will lead to a quality education and will meet accreditation standards. The Commission expects that CEOs and ALOs will disseminate information and provide leadership and training to their own campuses.

In the same spirit of collaboration with which you offered your suggestions, the Commission wishes to suggest that the Chancellor's Office endorse the philosophy and set the expectation that all California Community Colleges meet or exceed accreditation standards, and that college CEOs support and engage themselves in the efforts needed to develop their own staffs' capacities to understand and apply the standards in order to help their own institutions achieve educational excellence. The vast majority of California Community Colleges *already do this*, but those that are struggling, and presumably those that believe they need more training, also need the leadership of the CEO and the ALO at their own campuses. The Chancellor's Office might encourage the CEOs of those California Community Colleges in need to make a greater effort to attend the workshops and presentations that the Commission sponsors, as well as send their staffs to such trainings. They can also be encouraged to contact the Commission directly for assistance.

- 3. Review the ACCJC visiting team selection process and consider means to involve a wider cross-section of the individuals in our system who desire to participate. Team participation should be considered a professional development opportunity.**

The Commission adheres to the principle that member institutions expect and deserve an experienced evaluation team, and therefore tries to limit the number of first time evaluators on any comprehensive team to no more than two.

The Commission introduces new individuals to team service through participation on a comprehensive team. The Commission fields approximately 13 comprehensive teams each semester, approximately 26 per year. This means there are only approximately 52 slots per year available to give first time team members their first experience.

Those approximately 52 slots are divided among evaluators in all ranks used on evaluation teams – administrators, faculty, institutional researchers, CFOs, trustees, etc. Therefore, each group may perceive that few new evaluators are selected each year. Some kinds of expertise are in higher demand than others and will receive more of the “slots” for first time team members than others.

While the Commission concurs that participation on a team is a professional development opportunity, the primary purpose of team service is to provide excellent peer review to an institution undergoing accreditation review. Therefore, the Commission seeks individuals who wish to serve more than once, and who can develop the level of evaluator experience and commitment to accreditation that best serves the member institutions. Participation in the institutional self study and in the institutional improvement process is itself an excellent professional development opportunity available at each campus.

4. Scale accreditation expectations of the Western Region colleges to benchmarks formulated relative to evidence of best practices documented in all of the accrediting regions of the country.

The ACCJC’s standards are considered the “best practices” by the member institutions of the ACCJC. They also align closely with national best practices among regional accrediting bodies, and with federal regulations that impose requirements on accreditors. They are not impossible to comply with; many institutions meet and exceed the Standards. The ACCJC developed its standards using multiple task forces with participants from many of its member institutions. The standards were sent out for member and public comment, many hearings were held, and input taken, before they were adopted.

Through the Council of Regional Accrediting Commissions (CRAC), the ACCJC regularly shares ideas for standards, policies and training practices with the other six regional accrediting commissions. The ideas that led to the current Standards’ emphasis on student learning and assessment stemmed from this ongoing and frequent exchange with other regional accrediting commissions, as have many other ideas that the Commission has incorporated into its practices.

However, the ACCJC must evaluate institutions against its own Standards of Accreditation, and will continue to do so. This is a basic requirement for retaining recognition by the U.S. Department of Education. The value of accreditation for each member institution is based in public confidence that the standards are appropriate, rigorous and applied equally to all institutions. If the standards are relaxed for some institutions, the value of accreditation, and public perception of institutional quality, is diminished for all member institutions.

5. Consider lengthening the cycle of accreditation to 8 – 10 years.

The regional commissions with a longer cycle are starting to change to a shorter cycle; in the view of some accreditors and some at the Department of Education, the ten year cycle is too long a period between comprehensive evaluation reviews. Rather, current federal demands seem to be pushing recognized accreditors toward more frequent monitoring and greater annual oversight of institutions.

The ACCJC is always looking at the appropriate length of the cycle, for balancing the costs of accreditation and the benefits to institutions of accreditation. One thing the Commission is finding is that the turnover of institutional leadership is so great within the current six year cycle that many institutions have gaps in their responsiveness to the Standards.

Institutions are expected to be in compliance with the Standards at all times, not just during the peak of the accreditation cycle. A change in leadership is not an acceptable excuse for failing to maintain that compliance. The public and students have an expectation that the institution continuously meets quality standards; they do not expect the institutional quality to change with leadership changes. The only way to maintain quality is to continuously meet the Standards. Until institutions become more reliably compliant with accreditation standards, the ACCJC is unlikely to lengthen the accreditation cycle.

That being said, the Commission may explore this idea in the future.

6. Employ cooperative ways to have accreditation result in improvement rather than compliance.

Institutions whose response to accreditation requirements is one of minimal compliance have not fully embraced the purpose and value of accreditation. College leadership is responsible for helping these institutions move beyond compliance by valuing and leading a culture of inquiry, assessment and improvement with a focus on student success. The Introduction to the Standards and Standard IV.A., are helpful to those wishing to better understand these concepts.

Accreditation is voluntary; institutions submit to accreditation voluntarily. The Commission's operations and processes are *based in cooperation* among professionals across institutions. A professional commitment to self and peer review, and to continuous improvement, forms the heart of higher education's system of self regulation – accreditation.

The Commission believes that the idea that compliance and improvement are at two ends of a continuum, and that therefore gains in one area result in losses in the other, is a fallacy. Rather, Improvement and Compliance occur together. Institutional improvement leads to compliance with the Standards. Or, since the Standards require good practices, including practices of assessment and continuous quality improvement, compliance leads to institutional improvement.

Over the past decade, there has been increased pressure from national entities (The Spellings

Commission is a good example among many others) and through legislation and regulation by Congress and the Department of Education that have pushed accreditors and institutions to increase focus on *both* improvement and compliance.

The push for *greater focus on improvement* has come from requirements that institutions have in place *their own processes* for continuous quality improvement. Institutions know the elements of such a process well – they are program review, planning, implementation, and re-assessment or evaluation. It is no longer sufficient to use the accreditation self study and team review as the only form of evaluation or assessment of institutional and programmatic quality. Public expectations that institutions continuously improve are greater than ever before.

At the same time, there has been *pressure for more compliance* – operationally defined by meeting the Standards of Accreditation. The “Two Year Rule”, adopted by the Department as a result of the Higher Education Act in 1998, requires accreditors to require institutions to come into compliance with accreditation standards within two years of a finding of non-compliance. A similar rule applies to accreditors. The “One Year Rule” requires accreditors out of compliance with federal laws or regulations to come into compliance within one year. The public has a growing expectation that institutions will engage in continuous quality improvement while maintaining compliance, and will quickly come into compliance when found to be out of compliance. (e.g., the new federal priorities such as The American Graduation Initiative, the Race to the Top.)

Also develop more non-public ways to communicate to campuses their need for improvement.

The genie is out of the bottle on this issue. The Commission moved to all public sanctions many years ago in response to pressures from the Department of Education. The increasing public, student and government interest in institutional quality has created a climate in which more information about accreditation decisions is demanded. This is part of a national trend toward transparency for the purpose of holding agencies accountable. Public confidence in accreditation is associated with that openness. In this time of increased expectations of transparency, it is not in the best interests of higher education’s system of self regulation to try to regain privacy or secrecy on accreditor actions on institutions.

It is the Commission’s experience, and many institutions tell us they share our perception, that the public Commission action, while sometimes painful, is also useful to institutions. It alerts the parties that must work to improve institutional practices, and is used by leaders to focus institutional energies on improvements, and if necessary, to leverage constituencies to action. A private sanction does not provide such leverage or incentive.

7. Avoid recommendations that encroach on negotiable issues.

This would not be in the best interests of institutional quality nor of students. The ACCJC’s institutional membership includes institutions with and without collective bargaining units. It is the Commission’s obligation to the public and to member institutions that the standards be

applied uniformly to all institutions that choose to be accredited by the ACCJC. The existence of labor contracts does not exempt any accredited institution from meeting all accreditation standards and policy directives. Member institutions are responsible for labor relations matters at their own institutions. Labor unions are encouraged to raise any direct concerns with their own institutions.

The Commission remains open to continuing and even expanding, where possible, its training collaborations with the California Community College system-wide organizations within the context of the information provided above.

The Commission thanks you for your suggestions, hopes that this response has been informative, and encourages your support for institutional adherence to the Standards of Accreditation as a means to support institutional quality among the California Community Colleges and greater student success.

Sincerely,



Lurelean B. Gaines
Chair, ACCJC



Barbara A. Beno, Ph.D.
President, ACCJC

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Enclosure